

# **Exhibit BB**

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\*\*\*\*\* C O N F I D E N T I A L \*\*\*\*\*  
  
IN THE UNITED STATES DISTRICT COURT  
  
FOR THE SOUTHERN DISTRICT OF NEW YORK

- - -

EASTERN PROFIT CORPORATION,	)	
LIMITED,	)	
	)	
Plaintiff/Counterclaim Defendant,	)	
	)	
v.	)	Case No.
	)	18-cv-2185
STRATEGIC VISION US, LLC,	)	(JGK)
	)	
Defendant/Counterclaim Plaintiff.	)	
-----	)	

DEPOSITION OF  
  
LIANCHAO HAN  
  
WASHINGTON, D.C.  
  
AUGUST 28, 2019

ATKINSON-BAKER, INC.  
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REPORTED BY: CATHERINE B. CRUMP  
FILE NO. AD07997

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<p>1 <b>Q. After you came to the U.S., maybe if you</b> 09:19</p> <p>2 <b>just could walk us through your career since you've</b> 09:19</p> <p>3 <b>been here.</b> 09:19</p> <p>4 A. I went to a year of law school and I 09:19</p> <p>5 didn't quite -- I finished a program, but when the 09:19</p> <p>6 Tieneman Square massacre occurred and I become a 09:19</p> <p>7 student leader in this country, we organized protests 09:20</p> <p>8 against China's crackdown, and about 300 universities 09:20</p> <p>9 in this country, the Chinese student scholars formed 09:20</p> <p>10 a group that elected me as their first vice 09:20</p> <p>11 president. So we carried out the pro-democracy 09:20</p> <p>12 protest of, you know, Chinese students in this 09:20</p> <p>13 country and, also, we prepared ourself for to 09:20</p> <p>14 practice democracy and to learn how democracy works 09:20</p> <p>15 here and, meanwhile, we lobby U.S. Congress, U.S. 09:20</p> <p>16 Government, for a tougher human rights policy against 09:20</p> <p>17 China. 09:21</p> <p>18 So after, I did that work in Washington, D.C. 09:21</p> <p>19 for about a year and I worked in the U.S. Senate for 09:21</p> <p>20 about 12 years. I worked for three different 09:21</p> <p>21 Senators, served as a staff attorney, staff 09:21</p> <p>22 legislative counsel, and policy director. After 09:21</p> <p style="text-align: right;">Page 10</p>	<p>1 <b>that you are a speaker and writer about U.S.-Chinese</b> 09:23</p> <p>2 <b>relations?</b> 09:23</p> <p>3 A. Correct. 09:23</p> <p>4 <b>Q. And you follow domestic politics in</b> 09:23</p> <p>5 <b>China as well?</b> 09:23</p> <p>6 A. Correct. 09:23</p> <p>7 <b>Q. If I were to ask you what Chairman --</b> 09:23</p> <p>8 <b>well, let me back up for a second.</b> 09:23</p> <p>9 <b>Who is the president of China?</b> 09:23</p> <p>10 A. Xi Jinping. 09:23</p> <p>11 <b>Q. Is he also the chairman of the Chinese</b> 09:23</p> <p>12 <b>Communist Party?</b> 09:23</p> <p>13 A. Yes. 09:23</p> <p>14 <b>Q. Have you heard of a program of his</b> 09:23</p> <p>15 <b>called China Dream?</b> 09:23</p> <p>16 A. Yes. 09:23</p> <p>17 <b>Q. What is that?</b> 09:23</p> <p>18 A. It is his idea. It's rhetoric about 09:23</p> <p>19 rejuvenating the nationalism of China. That's 09:23</p> <p>20 basically what it is. 09:23</p> <p>21 <b>Q. Okay. And what does rejuvenating of the</b> 09:23</p> <p>22 <b>nationalism of China entail, more specifically?</b> 09:24</p> <p style="text-align: right;">Page 12</p>
<p>1 that, I went back to finish my Ph.D., and after 09:21</p> <p>2 Ph.D., I went back to community college to study 09:21</p> <p>3 science and went to John Hopkins to get another 09:21</p> <p>4 master's degree in biotechnology, and when Liu 09:21</p> <p>5 Xiaobo, we promoted Liu Xiaobo to get the Nobel Peace 09:21</p> <p>6 Prize, and after that, I feel that we want to 09:21</p> <p>7 organize to run Liu Xiaobo. 09:22</p> <p>8 So I joined a human rights group called 09:22</p> <p>9 Citizens for Initiative for China and I served as the 09:22</p> <p>10 vice president of the group until now. I'm still the 09:22</p> <p>11 vice president of the group. So we basically lobby 09:22</p> <p>12 Congress, educate American general public about China 09:22</p> <p>13 and about, you know, for improved democracy for human 09:22</p> <p>14 rights. 09:22</p> <p>15 <b>Q. Now, is it true -- I mentioned earlier</b> 09:22</p> <p>16 <b>that you're an attorney. You're a patent attorney;</b> 09:22</p> <p>17 <b>is that right?</b> 09:22</p> <p>18 A. Correct. 09:22</p> <p>19 <b>Q. Do you have any patents?</b> 09:22</p> <p>20 A. I didn't myself. I didn't get a chance 09:22</p> <p>21 to file. 09:22</p> <p>22 <b>Q. Okay. Okay. Is it also fair to say</b> 09:22</p> <p style="text-align: right;">Page 11</p>	<p>1 A. More specifically -- 09:24</p> <p>2 MR. GAVENMAN: Objection to form. 09:24</p> <p>3 THE WITNESS: Huh? 09:24</p> <p>4 MR. GAVENMAN: I said objection to form. 09:24</p> <p>5 THE WITNESS: It's, basically, you know, make 09:24</p> <p>6 China the greatest country in the world. 09:24</p> <p>7 BY MR. GREIM: 09:24</p> <p>8 <b>Q. Does that entail competition with the</b> 09:24</p> <p>9 <b>United States?</b> 09:24</p> <p>10 A. Absolutely. 09:24</p> <p>11 <b>Q. Does it involve undermining United</b> 09:24</p> <p>12 <b>States' interests?</b> 09:24</p> <p>13 A. Of course. 09:24</p> <p>14 <b>Q. Now, I take it, based on the background</b> 09:24</p> <p>15 <b>that you've just given us, that one of your goals is</b> 09:24</p> <p>16 <b>not to advance President Xi's goals. Am I right</b> 09:24</p> <p>17 <b>about that?</b> 09:24</p> <p>18 MR. GREIM: Object to the form. 09:24</p> <p>19 THE WITNESS: Yes. 09:24</p> <p>20 MR. GREIM: Okay. Brief interlude: I want 09:25</p> <p>21 to mark as Exhibit 1 a production I received from 09:25</p> <p>22 your counsel in the wee hours. 09:25</p> <p style="text-align: right;">Page 13</p>

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1	[Han Exhibit No. 1 was	09:25	1	A. No.	09:27
2	marked for identification.]	09:25	2	<b>Q. No. Why did you set your --</b>	09:27
3	BY MR. GREIM:	09:25	3	A. I was searching for all the text	09:27
4	<b>Q. I'll show you what's been marked as Han</b>	09:25	4	messages and I noticed my Signal with Mike and French	09:27
5	<b>Exhibit 1, and you'll see it starts off with a letter</b>	09:25	5	is not set correctly. Sometimes, you know, it	09:27
6	<b>from your attorney, Mr. Gavenman, that takes up the</b>	09:25	6	changes. So I set it to 10 seconds.	09:27
7	<b>first two pages and then there are a total of four</b>	09:25	7	<b>Q. What was it set to before 10 seconds?</b>	09:27
8	<b>Bates-labeled pages. Do you see that?</b>	09:25	8	A. Before, I set it usually automatically	09:27
9	A. Yeah.	09:25	9	just erase it after read.	09:28
10	<b>Q. Are those four pages the documents that</b>	09:25	10	<b>Q. Did you have any communications with Mr.</b>	09:28
11	<b>you gave to your attorney to produce to me?</b>	09:25	11	<b>Guo that you did not produce?</b>	09:28
12	A. Yes.	09:25	12	A. No. With Mr. Guo, we don't use Signal.	09:28
13	<b>Q. And the redaction, I take it, is just</b>	09:25	13	<b>Q. What do you use to communicate with Mr.</b>	09:28
14	<b>your communication with your counsel about what is</b>	09:26	14	<b>Guo?</b>	09:28
15	<b>below; is that right?</b>	09:26	15	A. With What's App. WhatsApp, I also	09:28
16	A. Yes.	09:26	16	automatically to delete it whenever I read the	09:28
17	<b>Q. Okay. Now, this morning, you also</b>	09:26	17	message. Can I add?	09:28
18	<b>produced a folder of hard copy documents; is that</b>	09:26	18	MR. GAVENMAN: Sure.	09:28
19	<b>right?</b>	09:26	19	BY MR. GREIM:	09:29
20	A. Yes.	09:26	20	<b>Q. Sure.</b>	09:29
21	<b>Q. Okay. We are looking at those and we'll</b>	09:26	21	A. For this particular project, at the very	09:29
22	<b>cover those later after we have a chance for a break.</b>	09:26	22	beginning, we all agreed we're not -- everything has	09:29
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1	<b>Okay?</b>	09:26	1	to be in person, face-to-face meeting, no digital	09:29
2	A. Okay.	09:26	2	transmission of any sort of documents.	09:29
3	<b>Q. I want to ask you do you have -- I have</b>	09:26	3	<b>Q. And why was that?</b>	09:29
4	<b>mentioned to your counsel the other day that I</b>	09:26	4	A. Because everybody agreed to keep secret.	09:29
5	<b>thought you may have text messages. Did you search</b>	09:26	5	So we don't communicate on the digital platform	09:29
6	<b>for and find any text messages or Signal messages</b>	09:26	6	whatsoever.	09:29
7	<b>with either Ms. Wallop or Mr. Waller?</b>	09:26	7	<b>Q. However, do you recall that, in fact,</b>	09:29
8	A. All the messages are deleted. It said	09:26	8	<b>some text communications did occur between you and</b>	09:29
9	automatically deleted. I don't have any.	09:26	9	<b>Ms. Wallop and Mr. Waller?</b>	09:29
10	<b>Q. Now, I will represent to you that when</b>	09:26	10	A. I don't remember.	09:29
11	<b>you use Signal and you change the settings on</b>	09:27	11	<b>Q. Okay.</b>	09:29
12	<b>there --</b>	09:27	12	A. If there is, it must be very vague. I	09:29
13	A. Correct.	09:27	13	don't think we discussed that directly.	09:29
14	<b>Q. -- it tells everybody else your</b>	09:27	14	<b>Q. Specifically, have you had</b>	09:30
15	<b>contacts.</b>	09:27	15	<b>communications with Ms. -- well, let me back up.</b>	09:30
16	A. Yes.	09:27	16	<b>Have you had communications with Mr. Guo about</b>	09:30
17	<b>Q. And so, yesterday, I believe we saw a</b>	09:27	17	<b>this case?</b>	09:30
18	<b>notice that you had changed the settings to 10-second</b>	09:27	18	A. Let me think about this.	09:30
19	<b>delete. Now, is that correct? Did you do that?</b>	09:27	19	He called me on WhatsApp, blamed Mike and	09:30
20	A. That's correct.	09:27	20	French as a fraud, cheated him, and there was one	09:30
21	<b>Q. But your testimony -- well, let me ask</b>	09:27	21	situation, one time, that his supporters started	09:30
22	<b>you. That's not what deleted the messages, is it?</b>	09:27	22	about getting ready to attack me personally because I	09:31
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1	<b>information about the Clark Hill matter? What was</b>	09:38	1	colleagues that agree with me, we try to persuade him	09:40
2	<b>your involvement?</b>	09:38	2	not to pursue it, and that was the earliest	09:40
3	A. I was helping Miles for his asylum case.	09:38	3	discussion. Of course, he won't listen to me and I	09:40
4	<b>Q. So then you had interaction with the</b>	09:38	4	tried a few more times this, and then I don't think	09:41
5	<b>Clark Hill lawyers?</b>	09:38	5	he was -- you know, there's no way he agreed with me.	09:41
6	A. Correct.	09:38	6	So that was that.	09:41
7	<b>Q. How do you know that Chinese hackers did</b>	09:38	7	Then, later, I think we discussed. He didn't	09:41
8	<b>hack the Clark Hill law firm?</b>	09:38	8	discuss specifically about the case at all. He kept	09:41
9	A. Clark Hill told me.	09:38	9	saying French and Mike are frauds, cheated him, which	09:41
10	<b>Q. Do you believe them?</b>	09:38	10	we always have a different view on that. I disagree	09:41
11	A. Of course.	09:38	11	with him on that. So we argued back and forth. So	09:41
12	<b>Q. Okay. Let me ask about -- you mentioned</b>	09:38	12	that pretty much was our main conversation about the	09:41
13	<b>a couple of different conversations with Mr. Guo</b>	09:39	13	case, whether they're cheating him or not.	09:41
14	<b>about this case.</b>	09:39	14	<b>Q. Why do you disagree?</b>	09:41
15	A. Yes.	09:39	15	A. Because I think everybody comes in with	09:41
16	<b>Q. We talked about the longer conversation</b>	09:39	16	a good intention at the beginning.	09:42
17	<b>and then you said you met with him a few more times</b>	09:39	17	<b>Q. Who are the colleagues of Mr. Guo's that</b>	09:42
18	<b>in the office.</b>	09:39	18	<b>agreed with your position early on?</b>	09:42
19	A. Yes.	09:39	19	MR. GAVENMAN: Objection to form.	09:42
20	<b>Q. Now, whose office was that?</b>	09:39	20	Go ahead.	09:42
21	A. Miles' office.	09:39	21	THE WITNESS: At the meeting was his --	09:42
22	<b>Q. Where is that office?</b>	09:39	22	Victor Cedar and William Yu. Williams, he's a	09:42
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1	A. I think at -- what is that? 62 -- 64	09:39	1	manager, I think.	09:42
2	Street of New York.	09:39	2	BY MR. GREIM:	09:42
3	<b>Q. 64th Street on the upper east side?</b>	09:39	3	<b>Q. Is this William Je, J-E?</b>	09:42
4	A. Yeah.	09:39	4	A. J-E? I think Yu. Right? No.	09:42
5	<b>Q. Are those also the Golden Spring</b>	09:39	5	I don't remember his last name, but he was --	09:42
6	<b>offices?</b>	09:39	6	he was -- I remember he was at the meeting. He also	09:43
7	A. That, I don't know.	09:39	7	agreed with me not to pursue this case, because we --	09:43
8	<b>Q. When did those meetings occur, to the</b>	09:39	8	yeah. I predict what's going to happen exactly like	09:43
9	<b>best of your recollection?</b>	09:39	9	what's happening right now.	09:43
10	A. That's hard to know. I think maybe two	09:39	10	MR. GRENDI: I'm sorry. What was the name of	09:43
11	months ago, there was one, or three months ago and	09:39	11	the first individual?	09:43
12	then early -- I have been there maybe three, four	09:40	12	THE WITNESS: Victor.	09:43
13	times.	09:40	13	MR. GRENDI: Sorry. I was asking the court	09:43
14	<b>Q. Does Mr. Guo ask for your advice about</b>	09:40	14	reporter. I apologize.	09:43
15	<b>this case?</b>	09:40	15	MR. GREIM: That's okay. I was going to ask	09:43
16	A. No.	09:40	16	anyway.	09:43
17	<b>Q. What did you discuss with him about the</b>	09:40	17	MR. GRENDI: Okay. Fair enough.	09:43
18	<b>case? Let's start with the earliest meeting that you</b>	09:40	18	BY MR. GREIM:	09:43
19	<b>can remember.</b>	09:40	19	<b>Q. Victor, what was his last name?</b>	09:43
20	A. I think at the beginning, I strongly	09:40	20	A. Cedar. Cedar. Correct?	09:43
21	advised when he mentioned he's going to sue French	09:40	21	<b>Q. Was he at Foley, Hogue?</b>	09:43
22	and Mike, I opposed the idea. I also got his	09:40	22	A. No. He is a solo practitioner.	09:43
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1	<b>Q. Could you spell his last name?</b>	09:43	1	<b>Vision would likely counterclaim against him?</b>	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	<b>Q. What did you understand that William's</b>	09:43	4	difficult situation that will jeopardize your	09:46
5	<b>position was with Mr. Guo?</b>	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	<b>Q. Did you ever speak with Yvette Wang, who</b>	09:47
7	<b>Q. Do you know if he is the director of a</b>	09:44	7	<b>is sitting here at the table, about the lawsuit?</b>	09:47
8	<b>company called ACA?</b>	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	<b>Q. Do you know what role she plays for Mr.</b>	09:47
10	<b>Q. Have you heard of that company, ACA or</b>	09:44	10	<b>Guo?</b>	09:47
11	<b>ACA Capital Group Limited?</b>	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	<b>Q. What is that?</b>	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	<b>Q. This William Yu --</b>	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	<b>Q. -- where does he live?</b>	09:45	22	her out, put me back in.	09:48
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1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	<b>Q. Does he have a role with McQuary Capital</b>	09:45	3	observation.	09:48
4	<b>Group? Does that sound familiar?</b>	09:45	4	<b>Q. Well, have you heard of an entity called</b>	09:48
5	A. I don't remember. Is that Australian?	09:45	5	<b>Golden Spring New York or Golden Spring Hong Kong?</b>	09:48
6	<b>Q. It is.</b>	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	<b>Q. When the last time you saw William?</b>	09:45	9	<b>Q. Do you know whether Ms. Wang has a role</b>	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	<b>with either of the Golden Spring entities?</b>	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	<b>Q. I want to go back now. I just want to</b>	09:46	12	THE WITNESS: I didn't.	09:48
13	<b>make sure we cover this. Is there anything else that</b>	09:46	13	BY MR. GREIM:	09:48
14	<b>you discussed with Mr. Guo in these meetings in his</b>	09:46	14	<b>Q. Why was it that Ms. Wang -- well, let me</b>	09:48
15	<b>office --</b>	09:46	15	<b>back up.</b>	09:48
16	A. Yeah.	09:46	16	<b>Why do you say Ms. Wang was originally</b>	09:48
17	<b>Q. -- about the case that we haven't</b>	09:46	17	<b>excluded from the discussion?</b>	09:49
18	<b>covered yet?</b>	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	<b>Q. Did you tell Mr. Guo that Strategic</b>	09:46	22	system.	09:49
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<p>1 <b>Q. What do you mean, "within the system"?</b> 09:49</p> <p>2 A. With the communist, work for the Chinese 09:49</p> <p>3 Government. I didn't know the source, but I just 09:49</p> <p>4 didn't remember if he said that in the meeting or 09:49</p> <p>5 later, but that's my impression. 09:49</p> <p>6 <b>Q. Well, let me back up for a second. When</b> 09:49</p> <p>7 <b>did you first remember meeting her?</b> 09:49</p> <p>8 A. Meeting Yvette? 09:50</p> <p>9 <b>Q. Um-hum.</b> 09:50</p> <p>10 A. I think maybe two years ago. 09:50</p> <p>11 <b>Q. Okay. So it would be late summer of</b> 09:50</p> <p>12 <b>2017?</b> 09:50</p> <p>13 A. It will be August or September. August, 09:50</p> <p>14 most likely, yeah, August. 09:50</p> <p>15 <b>Q. How are you able to remember that time?</b> 09:50</p> <p>16 A. That was political asylum. Miles tried 09:50</p> <p>17 to -- that's why we were introduced to him and he did 09:50</p> <p>18 help him with his political asylum. Yeah. 09:50</p> <p>19 <b>Q. What I should have asked you in the very</b> 09:50</p> <p>20 <b>beginning was when did you first meet Mr. Guo?</b> 09:50</p> <p>21 A. I think it's either July or August, 09:50</p> <p>22 early August or, you know, late July of 2017. 09:50</p> <p style="text-align: right;">Page 30</p>	<p>1 <b>him with his various efforts to obtain political</b> 09:52</p> <p>2 <b>asylum from that point forward?</b> 09:52</p> <p>3 A. Correct. 09:52</p> <p>4 <b>Q. What was your initial impression of Mr.</b> 09:52</p> <p>5 <b>Guo?</b> 09:52</p> <p>6 A. I think he's a genuine warm person. He 09:52</p> <p>7 has a deep knowledge of how the communist system 09:53</p> <p>8 works and he has a reason to expose the high-ranking 09:53</p> <p>9 government officials that are corrupt and, also, he 09:53</p> <p>10 has many defects of the people from the communist 09:53</p> <p>11 system. 09:53</p> <p>12 <b>Q. What do you mean by that?</b> 09:53</p> <p>13 A. Like -- 09:53</p> <p>14 MR. GRENDI: Objection to form. 09:53</p> <p>15 THE WITNESS: He probably won't tell you 09:53</p> <p>16 exactly what he thinks. Sometimes he exaggerates 09:53</p> <p>17 what he's done and stuff like that. 09:53</p> <p>18 BY MR. GREIM: 09:53</p> <p>19 <b>Q. So you met Ms. Wang, then, within about</b> 09:53</p> <p>20 <b>a month or so of having met Mr. Guo himself?</b> 09:54</p> <p>21 A. Correct. 09:54</p> <p>22 <b>Q. Did your impression of Mr. Guo change</b> 09:54</p> <p style="text-align: right;">Page 32</p>
<p>1 <b>Q. And who introduced you?</b> 09:50</p> <p>2 A. His name is Jonathan Ho. The Chinese 09:51</p> <p>3 name is Chen Jun. 09:51</p> <p>4 <b>Q. Is that the last name, H-O?</b> 09:51</p> <p>5 A. Correct. 09:51</p> <p>6 <b>Q. Jonathan Ho. Who is Jonathan Ho?</b> 09:51</p> <p>7 A. He is a longtime friend of mine. He 09:51</p> <p>8 also used to be an activist, pro-democracy activist. 09:51</p> <p>9 He's a friend with the late Nobel Peace Prize winner 09:51</p> <p>10 Liu Xiaobo. 09:51</p> <p>11 <b>Q. So why did Mr. Ho introduce you to Mr.</b> 09:51</p> <p>12 <b>Guo?</b> 09:51</p> <p>13 MR. GRENDI: Objection, form. 09:51</p> <p>14 MR. GAVENMAN: Objection to form. 09:51</p> <p>15 THE WITNESS: I think, at the time, they were 09:52</p> <p>16 talking about the options, what to do, whether to 09:52</p> <p>17 seek political asylum or other form of protection, 09:52</p> <p>18 and he knows that, you know, I'm familiar with the 09:52</p> <p>19 American legal system. So he brought me to discuss 09:52</p> <p>20 those options with Miles. 09:52</p> <p>21 BY MR. GREIM: 09:52</p> <p>22 <b>Q. And is it fair to say that you assisted</b> 09:52</p> <p style="text-align: right;">Page 31</p>	<p>1 <b>over time?</b> 09:54</p> <p>2 A. No. 09:54</p> <p>3 <b>Q. Do you consider yourself to be a</b> 09:54</p> <p>4 <b>personal friend of Mr. Guo?</b> 09:54</p> <p>5 A. That's a very -- 09:54</p> <p>6 <b>Q. Sorry.</b> 09:54</p> <p>7 A. -- difficult question. I think I 09:54</p> <p>8 maintain a personal relationship with him and, also, 09:54</p> <p>9 politically, I support his effort and I also have a 09:55</p> <p>10 lot of reservation about him. 09:55</p> <p>11 <b>Q. What are those reservations?</b> 09:55</p> <p>12 A. He just brings troubles to me. You 09:55</p> <p>13 know, I live a very simple straightforward life. 09:55</p> <p>14 This is my first deposition, first -- you know, this, 09:55</p> <p>15 it's not fun. 09:55</p> <p>16 My focus is the big picture, how to change 09:55</p> <p>17 China, how to promote democracy. I don't want to 09:55</p> <p>18 sign on to derail from that goal. This definitely is 09:55</p> <p>19 troublesome to me. 09:55</p> <p>20 <b>Q. Do you have any concern about whether</b> 09:55</p> <p>21 <b>Guo is fully committed to overturning the Chinese</b> 09:56</p> <p>22 <b>communist system?</b> 09:56</p> <p style="text-align: right;">Page 33</p>

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1	A. Well, I think he's fully committed. At	09:56	1	MR. GRENDI: Object to the form.	09:58
2	the same time, he also has his relatives, his	09:56	2	THE WITNESS: I didn't know.	09:58
3	employees to be considered and his assets, although,	09:56	3	BY MR. GREIM:	09:58
4	all of it has been confiscated. So I understand his	09:56	4	<b>Q. Do you know whether he is negotiating</b>	09:58
5	position.	09:56	5	<b>with Chinese officials even today?</b>	09:59
6	<b>Q. And would it surprise you if Mr. Guo,</b>	09:56	6	A. I didn't know that either.	09:59
7	<b>for example, vacillates in wanting regime change</b>	09:56	7	<b>Q. Let's shift gears for a moment here and</b>	09:59
8	<b>versus something less than that?</b>	09:56	8	<b>-- well, before we move on. After you met Guo, Mr.</b>	09:59
9	MR. GRENDI: Object to the form.	09:57	9	<b>Guo --</b>	09:59
10	MR. GAVENMAN: Object to the form.	09:57	10	A. Yeah.	09:59
11	THE WITNESS: Can you rephrase that?	09:57	11	<b>Q. -- did he introduce you to others</b>	09:59
12	BY MR. GREIM:	09:57	12	<b>besides Yvette Wang over the next month or two?</b>	09:59
13	<b>Q. Sure. Sure. Would it surprise you that</b>	09:57	13	A. I met all his families, family members,	09:59
14	<b>Mr. Guo tries to bargain with Chinese officials?</b>	09:57	14	through him. I met with Tony Blair. I met -- who	09:59
15	MR. GRENDI: Object to the form.	09:57	15	else? There were several other people that's	09:59
16	MR. GAVENMAN: Objection to form.	09:57	16	significant maybe.	09:59
17	THE WITNESS: Frankly, I think it's possible,	09:57	17	<b>Q. Did he introduce you to someone named</b>	10:00
18	but it's unlikely, highly unlikely. It's too late	09:57	18	<b>Hansheng Wang?</b>	10:00
19	for that.	09:57	19	A. He never introduced me to Hansheng Wang.	10:00
20	BY MR. GREIM:	09:57	20	Hansheng Wang, I know used to be his staff. I got to	10:00
21	<b>Q. What do you mean by it's too late for</b>	09:57	21	know him in that capacity.	10:00
22	<b>that?</b>	09:57	22	<b>Q. What does Hansheng Wang do for Mr. Guo?</b>	10:00
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1	MR. GRENDI: Object to the form.	09:57	1	MR. GRENDI: Object to form.	10:00
2	MR. GAVENMAN: Objection to form.	09:57	2	MR. GAVENMAN: Object to the form.	10:00
3	THE WITNESS: He's already put himself in the	09:57	3	THE WITNESS: If I saw him, he do -- he does	10:00
4	position that he is the number one enemy of the	09:57	4	lots of different things, bodyguard, security. He	10:00
5	regime.	09:57	5	also cooks. What else he does? Run errands, book	10:00
6	BY MR. GREIM:	09:57	6	hotel rooms, you know.	10:00
7	<b>Q. When did he cross that line?</b>	09:57	7	BY MR. GREIM:	10:00
8	MR. GAVENMAN: Objection to form.	09:58	8	<b>Q. Does he run any companies?</b>	10:00
9	MR. GRENDI: Objection to the form.	09:58	9	A. I have no knowledge.	10:00
10	THE WITNESS: I don't know for sure. My	09:58	10	<b>Q. Do you know if he's a principal of</b>	10:00
11	speculation -- can I speculate?	09:58	11	<b>Eastern Profit?</b>	10:01
12	MR. GAVENMAN: You shouldn't speculate. Only	09:58	12	A. I didn't know that.	10:01
13	speak to things that you know.	09:58	13	<b>Q. Does he actually live in Mr. Guo's</b>	10:01
14	THE WITNESS: All right. But I think -- can	09:58	14	<b>apartment?</b>	10:01
15	I just say, more likely, after he turned the MSS	09:58	15	A. I didn't know that either.	10:01
16	Secretary of Discipline into FBI, they busted them at	09:58	16	MR. GAVENMAN: Objection to form.	10:01
17	La Guardia Airport and I think that's where he	09:58	17	MR. GRENDI: Object to the form.	10:01
18	crossed the line.	09:58	18	THE WITNESS: I saw him all the time there,	10:01
19	BY MR. GREIM:	09:58	19	but I didn't know he lived there.	10:01
20	<b>Q. Do you know whether he attempted to</b>	09:58	20	BY MR. GREIM:	10:01
21	<b>negotiate with Chinese officials even after that</b>	09:58	21	<b>Q. Which Guo family members were you</b>	10:01
22	<b>point?</b>	09:58	22	<b>introduced to?</b>	10:01
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1	A. I met his son, Wu Chun. I met his	10:01	1	<b>Guo?</b>	10:04
2	daughter, Wo Mei, his wife, Yu Chen Su.	10:01	2	MR. GRENDI: Object to the form.	10:04
3	<b>Q. We'll get some of these names here on</b>	10:01	3	THE WITNESS: I didn't approach them.	10:04
4	<b>the break.</b>	10:01	4	BY MR. GREIM:	10:04
5	A. Okay.	10:01	5	<b>Q. Did Ms. Wallop approach you?</b>	10:04
6	MR. GRENDI: Eddie, I'm just going to jump in	10:01	6	A. No. That's not the case. They were	10:04
7	here. Are we going to get on topic here? We're	10:02	7	introduced through Bill Gertz. Bill Gertz called me	10:04
8	talking about --	10:02	8	and said can you set up meeting with Miles; I want to	10:04
9	MR. GREIM: We are on topic.	10:02	9	introduce Mike and French, Strategic Vision, to help	10:04
10	MR. GRENDI: Talking about Mr. Guo's family	10:02	10	Miles. So I set up meeting and we were introduced	10:04
11	and who Mr. Lianchao has met, this has nothing to do	10:02	11	that way.	10:04
12	with this dispute.	10:02	12	<b>Q. Okay. Did you already know Mr. Gertz?</b>	10:04
13	MR. GREIM: Please don't disrupt the	10:02	13	A. Yes.	10:04
14	deposition.	10:02	14	<b>Q. How long have you known him?</b>	10:05
15	MR. GRENDI: I'm not disrupting the	10:02	15	A. Thirty years.	10:05
16	deposition. I want to move it along and have it on	10:02	16	<b>Q. Now, did Mr. Gertz, then, already seem</b>	10:05
17	topic. You know, we're discussing irrelevant stuff	10:02	17	<b>to know or already seem to have a specific project in</b>	10:05
18	right now, but please continue.	10:02	18	<b>mind for Mr. Guo?</b>	10:05
19	BY MR. GREIM:	10:02	19	MR. GRENDI: Objection.	10:05
20	<b>Q. When was the first time that you met</b>	10:02	20	MR. GAVENMAN: Object to the form.	10:05
21	<b>French Wallop?</b>	10:02	21	THE WITNESS: Yes.	10:05
22	A. Let's see. I would say September --	10:02	22	BY MR. GREIM:	10:05
Page 38			Page 40		
1	October or September of 2017.	10:02	1	<b>Q. What was that?</b>	10:05
2	<b>Q. Did you know her beforehand?</b>	10:02	2	A. I think that was the original proposal	10:05
3	A. I didn't know her. I know her -- I	10:02	3	French and Mike brought with them or maybe they first	10:05
4	worked with her husband many years ago. So I had a	10:02	4	gave it to me and I shared it with Miles to handle	10:05
5	very good relationship with his office. Naturally, I	10:03	5	his communication, pretty much.	10:05
6	know of her. I didn't met her.	10:03	6	<b>Q. So when Mr. Gertz came to you --</b>	10:05
7	<b>Q. Was this Senator Malcolm Wallop?</b>	10:03	7	A. Yes.	10:05
8	A. Correct.	10:03	8	<b>Q. -- and asked you to set up this</b>	10:05
9	<b>Q. What about Mr. Waller?</b>	10:03	9	<b>meeting --</b>	10:05
10	A. That was the same time I met with	10:03	10	A. Yes.	10:05
11	French.	10:03	11	<b>Q. -- did you understand that he had</b>	10:05
12	<b>Q. Did she you know of Mr. Waller before</b>	10:03	12	<b>already spoken to Ms. Wallop and Mr. Waller?</b>	10:05
13	<b>the fall of 2017?</b>	10:03	13	A. Absolutely.	10:06
14	A. No.	10:03	14	MR. GRENDI: Objection.	10:06
15	<b>Q. Let's talk a little bit about the</b>	10:03	15	BY MR. GREIM:	10:06
16	<b>research project that's at issue here. How is it</b>	10:03	16	<b>Q. At that time, let's say when -- let me</b>	10:06
17	<b>that -- well, let me ask you this: Did there come a</b>	10:03	17	<b>strike that.</b>	10:06
18	<b>time that you approached French Wallop about possible</b>	10:03	18	<b>When Mr. Gertz first contacted you about</b>	10:06
19	<b>work for Mr. Guo?</b>	10:04	19	<b>this --</b>	10:06
20	A. Say that again.	10:04	20	A. Yeah.	10:06
21	<b>Q. Did there come a time when you</b>	10:04	21	<b>Q. -- were you already aware that Mr. Guo</b>	10:06
22	<b>approached Ms. Wallop about possible work for Mr.</b>	10:04	22	<b>was looking for some type of research?</b>	10:06
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1	A. No.	10:06	1	but there was a huge leak of data that exposed lots	10:09
2	MR. GAVENMAN: Objection to form.	10:06	2	of Chinese Government officials' offshore companies.	10:09
3	MR. GRENDI: Objection to the form.	10:06	3	I looked into that.	10:09
4	THE WITNESS: Miles didn't even know what he	10:06	4	We did a lot of research through different	10:09
5	was looking for. He had -- this is not his idea	10:06	5	means and we submitted it the U.S. Government about	10:10
6	whatsoever.	10:06	6	those individuals, that corruption with a select few	10:10
7	BY MR. GREIM:	10:06	7	that specifically -- you know, based on the	10:10
8	<b>Q. Why did you agree to set up a meeting</b>	10:06	8	corruption and required the U.S. Government sanction	10:10
9	<b>between Wallop and Waller and Guo?</b>	10:07	9	them under the FCP Act.	10:10
10	A. I think French and Mike had very good	10:07	10	<b>Q. And -- okay. And was that with the</b>	10:10
11	experience in handling strategic communication. They	10:07	11	<b>Hudson Institute?</b>	10:10
12	have a good reputation in Washington, D.C., also	10:07	12	A. No. With the Citizen Power initiative	10:10
13	under the strong recommendation by Bill Gertz. I	10:07	13	and with the Hudson initiative.	10:10
14	also know Senator Wallop. So I, of course, I	10:07	14	<b>Q. I see. So in the fall of 2017 -- and</b>	10:10
15	naturally think they could do the job.	10:07	15	<b>then we'll take a break here.</b>	10:10
16	<b>Q. Before this project came along --</b>	10:07	16	A. Yeah.	10:10
17	A. Yeah.	10:07	17	<b>Q. In the fall of 2017, had you discussed</b>	10:10
18	<b>Q. -- had you ever been involved with any</b>	10:07	18	<b>with Mr. Guo that he might be able to contribute to</b>	10:10
19	<b>sort of research project into individuals?</b>	10:07	19	<b>something like that, to that kind of an effort?</b>	10:11
20	MR. GAVENMAN: Objection to form.	10:08	20	A. Yes, I did.	10:11
21	THE WITNESS: No.	10:08	21	<b>Q. And was that before Mr. Gertz contacted</b>	10:11
22	BY MR. GREIM:	10:08	22	<b>you about Ms. Wallop and Mr. Waller?</b>	10:11
Page 42			Page 44		
1	<b>Q. Had you ever been involved with any sort</b>	10:08	1	A. Yes.	10:11
2	<b>of research project into the Chinese Communist Party?</b>	10:08	2	<b>Q. So do you know whether Mr. Guo was at</b>	10:11
3	MR. GAVENMAN: Objection to form.	10:08	3	<b>least considering some sort of research project into</b>	10:11
4	THE WITNESS: Just personally on my -- what	10:08	4	<b>the Chinese Communist Party members?</b>	10:11
5	type of research? Can you rephrase that?	10:08	5	A. It's not --	10:11
6	BY MR. GREIM:	10:08	6	MR. GAVENMAN: Objection to form.	10:11
7	<b>Q. Sure. Maybe a project where there would</b>	10:08	7	MR. GRENDI: Objection to the form.	10:11
8	<b>be an effort to find nonpublic information about</b>	10:08	8	THE WITNESS: Yeah. It's not specific. This	10:11
9	<b>Chinese Communist Party members.</b>	10:08	9	idea, my point at the time when I communicated with	10:11
10	MR. GAVENMAN: Objection to form.	10:08	10	Miles, I said in order to have this whistle-blowing,	10:11
11	THE WITNESS: Not in -- we have done lots of	10:08	11	this disruptive momentum you made to continue -- they	10:11
12	-- I've done lots of research on the Communist Party	10:08	12	call it the whistle-blowing revolution to continue --	10:11
13	members, particularly on the corruption side. I	10:08	13	I told him you need very solid evidence to	10:11
14	worked with Hudson Institute. This Kleptocracy	10:08	14	sustainable expose Chinese communist high-ranking	10:11
15	Center, I helped them with the relationship, the	10:09	15	government officials.	10:12
16	mapping of Chinese high-ranking government officials,	10:09	16	So that was the principle. We never get into	10:12
17	their corruption, you know, potential corruption.	10:09	17	detail how to do it until Mike and French's proposal	10:12
18	I also worked on several other projects,	10:09	18	come over. I was the one -- originally, this project	10:12
19	tried to pinpoint the Chinese high-ranking government	10:09	19	basically is a communication, handling the	10:12
20	officials, the family corruption, and based on some	10:09	20	communication, P.R., not into the investigation. I	10:12
21	of the -- based on the international consortium, you	10:09	21	was the one who approached -- I explored this	10:12
22	know, there was a leak from Wikipedia for the source,	10:09	22	possibility with French and Mike first and they said	10:12
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1	they can do it and then I convinced Miles to move to	10:12	1	THE WITNESS: You mean through social media?	10:27
2	this direction. It's not from Miles. It's from me.	10:12	2	BY MR. GREIM:	10:27
3	MR. GREIM: Okay. I don't know that we've	10:12	3	<b>Q. Through social media.</b>	10:27
4	been going for quite an hour yet, but let's go ahead	10:12	4	A. Yes.	10:27
5	and take our first break, if that's okay.	10:13	5	<b>Q. So you reviewed some of those items</b>	10:27
6	THE WITNESS: All right.	10:13	6	<b>yourself?</b>	10:27
7	MR. GREIM: We'll take a -- let's go ahead	10:13	7	A. Usually, you know, his media videos are	10:27
8	and try to just make it five, if we can.	10:13	8	too long. I usually don't watch it unless there's a	10:28
9	VIDEOGRAPHER: Going off the record. The	10:13	9	specific issue I found interesting.	10:28
10	time is 10:15 a.m.	10:13	10	<b>Q. Now, did you talk with Mr. Guo about his</b>	10:28
11	[Recess.]	10:26	11	<b>own background?</b>	10:28
12	VIDEOGRAPHER: We are back on the record.	10:26	12	<b>And this is -- we're going to limit it to, you</b>	10:28
13	The time is now 10:28 a.m.	10:26	13	<b>know, all your discussions with him up until the time</b>	10:28
14	BY MR. GREIM:	10:26	14	<b>you introduced Strategic Vision to Mr. Guo.</b>	10:28
15	<b>Q. Welcome back, Mr. Han.</b>	10:26	15	MR. GREIM: Object to the form.	10:28
16	A. Yes.	10:26	16	MR. GAVENMAN: Object to form.	10:28
17	<b>Q. Let's go again to the same timeframe</b>	10:26	17	THE WITNESS: There are some discussions,	10:28
18	<b>we've been talking about, sort of late summer, early</b>	10:26	18	because I think that's also privileged because of	10:28
19	<b>fall of 2017. At that time, is it fair to say that</b>	10:26	19	related to his political asylum. I think it's better	10:28
20	<b>your interactions with Mr. Guo were, number one,</b>	10:26	20	not for me to talk about it.	10:28
21	<b>about his asylum application --</b>	10:26	21	BY MR. GREIM:	10:28
22	A. Correct.	10:26	22	<b>Q. Did he retain you as counsel on the</b>	10:28
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1	<b>Q. -- and, number two, some general</b>	10:26	1	<b>political asylum matter?</b>	10:29
2	<b>discussions about what it would take for him to sort</b>	10:26	2	A. Not as counsel, but as facilitator, you	10:29
3	<b>of be a whistleblower about the Chinese Communist</b>	10:26	3	know, sort of a legal assistant. We -- yeah.	10:29
4	<b>Party?</b>	10:26	4	<b>Q. Okay. So I want to make sure I'm clear.</b>	10:29
5	MR. GAVENMAN: Objection.	10:26	5	<b>Do you believe you were acting as his attorney?</b>	10:29
6	MR. GREIM: Object to the form.	10:26	6	A. I wasn't --	10:29
7	THE WITNESS: He was already a whistleblower	10:26	7	MR. GREIM: Object to form.	10:29
8	at the time. My suggestion was to sustain that	10:27	8	MR. GAVENMAN: Object to the form.	10:29
9	whistleblower.	10:27	9	[Interruption.]	10:29
10	BY MR. GREIM:	10:27	10	BY MR. GREIM:	10:29
11	<b>Q. Now, by this point, had you done any</b>	10:27	11	<b>Q. Were you able to finish your answer?</b>	10:29
12	<b>research of your own into Mr. Guo's background?</b>	10:27	12	A. Yes.	10:29
13	A. A little bit.	10:27	13	<b>Q. Were you being paid by Guo at this time?</b>	10:29
14	<b>Q. Okay. What did you do to look into his</b>	10:27	14	A. No.	10:29
15	<b>background?</b>	10:27	15	MR. GREIM: Object to the form.	10:29
16	A. Just online information.	10:27	16	BY MR. GREIM:	10:29
17	<b>Q. So you read some of the articles that</b>	10:27	17	<b>Q. By the way, have you ever been paid by</b>	10:29
18	<b>had been written about him?</b>	10:27	18	<b>Mr. Guo or by one of the entities he controls?</b>	10:29
19	A. Correct.	10:27	19	A. No.	10:30
20	<b>Q. And by this point, had he begun posting</b>	10:27	20	MR. GREIM: Objection.	10:30
21	<b>things online himself?</b>	10:27	21	MR. GAVENMAN: Objection to form.	10:30
22	MR. GREIM: Object to the form.	10:27	22	BY MR. GREIM:	10:30
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1	<b>Q. Have you been paid by the Rule of Law</b>	10:30	1	MR. GAVENMAN: Objection to form.	10:32
2	<b>Foundation?</b>	10:30	2	MR. GRENDI: Objection.	10:32
3	A. No.	10:30	3	THE WITNESS: A lot of that discussion, you	10:32
4	<b>Q. Okay. Then here's what I'll do. I'm</b>	10:30	4	know, this is all from the meeting.	10:32
5	<b>not -- I don't believe a privilege will apply to</b>	10:30	5	MR. GAVENMAN: So I'm going to instruct you	10:32
6	<b>shield his disclosures to you about his past from</b>	10:30	6	not to answer, attorney-client privilege.	10:32
7	<b>discovery, but what I'm going to do is just simply</b>	10:30	7	THE WITNESS: Yeah.	10:32
8	<b>ask you about your knowledge. Okay?</b>	10:30	8	BY MR. GREIM:	10:32
9	<b>And what we'll try to do is not put it -- we</b>	10:30	9	<b>Q. Did Mr. Guo make representations to</b>	10:32
10	<b>will try not to ask about conversations that you had</b>	10:30	10	<b>French Wallop or Mike Waller about his past?</b>	10:32
11	<b>with him while his asylum counsel were present.</b>	10:30	11	MR. GAVENMAN: Objection to form, foundation.	10:33
12	<b>Okay?</b>	10:30	12	THE WITNESS: During the meeting with them?	10:33
13	A. [Gestures.]	10:30	13	BY MR. GREIM:	10:33
14	<b>Q. Okay.</b>	10:30	14	<b>Q. Yes.</b>	10:33
15	MR. GAVENMAN: Let me caution you. To the	10:30	15	A. I didn't remember exactly what he said	10:33
16	extent you learned anything in the course of those	10:31	16	to them. I think that maybe there is some	10:33
17	discussions, you shouldn't disclose that either.	10:31	17	discussion.	10:33
18	THE WITNESS: Correct.	10:31	18	<b>Q. Did Mr. Guo participate in the Tieneman</b>	10:33
19	BY MR. GREIM:	10:31	19	<b>Square protest?</b>	10:33
20	<b>Q. So did you understand that Mr. Guo</b>	10:31	20	A. During the time of that meeting?	10:33
21	<b>became a dissident during the Tieneman Square</b>	10:31	21	MR. GAVENMAN: Asked and answered.	10:33
22	<b>demonstrations and massacre?</b>	10:31	22	MR. GRENDI: Objection.	10:33
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1	A. Say that again.	10:31	1	MR. GAVENMAN: We've established that there	10:33
2	<b>Q. Well, let me ask you a different</b>	10:31	2	is privilege attached to that answer. So I instruct	10:33
3	<b>question, because that's -- did you understand that</b>	10:31	3	you not to answer as well.	10:33
4	<b>Mr. Guo participated in the Tieneman Square</b>	10:31	4	BY MR. GREIM:	10:33
5	<b>demonstrations and massacre?</b>	10:31	5	<b>Q. What do you remember about what Mr. Guo</b>	10:33
6	MR. GRENDI: Object to the form.	10:31	6	<b>said about himself to Ms. Wallop and Mr. Waller?</b>	10:34
7	MR. GAVENMAN: Objection.	10:31	7	A. I don't remember much.	10:34
8	THE WITNESS: Understand?	10:31	8	<b>Q. What do you remember though?</b>	10:34
9	BY MR. GREIM:	10:31	9	A. I remember specifically what was	10:34
10	<b>Q. Yes. Did you believe?</b>	10:31	10	discussed about the proposal, you know, what to do	10:34
11	MR. GRENDI: Objection.	10:31	11	about what information is required and the back and	10:34
12	MR. GAVENMAN: Objection. This is pretty far	10:31	12	forth.	10:34
13	afield from what Mr. Han is here to testify about.	10:31	13	<b>Q. What did Mr. Guo say he wanted to do</b>	10:34
14	I'm not sure how this is a good use of your time, but	10:31	14	<b>with the research?</b>	10:34
15	you can keep going.	10:32	15	A. He wanted --	10:34
16	THE WITNESS: That discussion is with his	10:32	16	MR. GAVENMAN: Objection.	10:34
17	counsel.	10:32	17	MR. GRENDI: Objection to form.	10:34
18	MR. GAVENMAN: So objection, privilege. I	10:32	18	THE WITNESS: He wanted to expose the	10:34
19	instruct you not to answer.	10:32	19	corruption of the highest-ranking members of the	10:34
20	THE WITNESS: Right.	10:32	20	Communist Party.	10:34
21	BY MR. GREIM:	10:32	21	BY MR. GREIM:	10:34
22	<b>Q. Do you know why Mr. Guo left China?</b>	10:32	22	<b>Q. Did he say how he wanted to do that?</b>	10:34
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1	A. That was during the discussion. How	10:34	1	A. Let's make it clear.	10:38
2	he's going to do it, I don't think he has an idea.	10:35	2	<b>Q. That's right. So Mr. Gertz is the one</b>	10:38
3	We proposed -- I actually talked to French and Mike,	10:35	3	<b>who introduced Wallop and Waller to you and then you</b>	10:38
4	seeing whether we can use some unconventional way to	10:35	4	<b>met with Wallop and Waller after that?</b>	10:38
5	obtain this information.	10:35	5	A. He is introducing them to Miles. I am	10:39
6	<b>Q. Do you know, roughly, when Mr. Guo began</b>	10:35	6	the facilitator to set it up.	10:39
7	<b>speaking out against Communist Part members?</b>	10:36	7	<b>Q. Okay. I'm going to direct you to --</b>	10:39
8	MR. GAVENMAN: Objection the form.	10:36	8	<b>and, first of all, this article is based on Mr.</b>	10:39
9	THE WITNESS: I would say in the America, at	10:36	9	<b>Gertz's interview of Mr. Guo. I want to direct you</b>	10:39
10	least, I know, maybe April of 2017. This is during	10:36	10	<b>first to -- before we do this, let me ask you are you</b>	10:39
11	his interview with Mirror Tv.	10:36	11	<b>aware of an alleged Chinese origin cyber attack on</b>	10:39
12	BY MR. GREIM:	10:36	12	<b>the Hudson Institute?</b>	10:39
13	<b>Q. What the Mirrow Tv?</b>	10:36	13	A. Yes.	10:39
14	A. It's a Chinese language TV, maybe the	10:36	14	<b>Q. And you recall that Guo has frequently</b>	10:39
15	largest Chinese language media group here, based in	10:36	15	<b>cited that as evidence that the Chinese Government is</b>	10:39
16	New York.	10:36	16	<b>out to get him, basically?</b>	10:39
17	<b>Q. Have you seen that interview?</b>	10:36	17	MR. GRENDI: Objection to form.	10:39
18	A. I didn't.	10:36	18	MR. GAVENMAN: Objection to the form.	10:39
19	<b>Q. Have you seen --</b>	10:36	19	THE WITNESS: I didn't know.	10:40
20	A. Maybe just very part.	10:37	20	BY MR. GREIM:	10:40
21	<b>Q. I'm sorry? You may have just seen part</b>	10:37	21	<b>Q. Okay. Were you helping to plan the</b>	10:40
22	<b>of it?</b>	10:37	22	<b>Hudson event?</b>	10:40
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1	A. Maybe a small part of it, not directly	10:37	1	A. Correct.	10:40
2	from Tv. They always, you know, like through You	10:37	2	MR. GRENDI: Objection.	10:40
3	Tube, somebody else posted it.	10:37	3	BY MR. GREIM:	10:40
4	<b>Q. Right. Have you seen other interviews</b>	10:37	4	<b>Q. Are you aware that the Hudson event --</b>	10:40
5	<b>of Mr. Guo on You Tube or on TV?</b>	10:37	5	<b>well, who was in charge of the HUD event within the</b>	10:40
6	A. I might, but very limited.	10:37	6	<b>institute?</b>	10:40
7	<b>Q. Do you remember what articles you</b>	10:37	7	A. It was Charles Davidson at the	10:40
8	<b>reviewed about Mr. Guo's past?</b>	10:37	8	beginning.	10:40
9	A. I didn't.	10:37	9	<b>Q. What was the last name?</b>	10:40
10	[Han Exhibit No. 2 was	10:38	10	A. Davidson, and then I took it over,	10:40
11	marked for identification.]	10:38	11	because he said he's not able to do it. He's afraid	10:40
12	BY MR. GREIM:	10:38	12	that, you know, his son-in-law's -- his son's fiance,	10:40
13	<b>Q. I'm going to show you what we are</b>	10:38	13	who is Chinese, will be retaliated against. So he	10:40
14	<b>marking as Exhibit 2. You'll see this is an article</b>	10:38	14	asked me to take over.	10:40
15	<b>by Bill Gertz, who we mentioned a few times earlier</b>	10:38	15	<b>Q. Who is the person at Hudson who agreed</b>	10:40
16	<b>today. It appeared October 9, 2017.</b>	10:38	16	<b>to cancel the event?</b>	10:40
17	<b>Is this around the time, by the way, that you</b>	10:38	17	A. I think the --	10:40
18	<b>were introducing Ms. Wallop and Mr. Waller to Mr.</b>	10:38	18	MR. GRENDI: Objection to the form.	10:40
19	<b>Guo?</b>	10:38	19	MR. GAVENMAN: Objection.	10:40
20	A. I think this is before the time that he	10:38	20	THE WITNESS: I think the head of -- the CEO,	10:40
21	was introducing.	10:38	21	Ken Winston. I don't know exactly who agreed, but it	10:41
22	<b>Q. That's right.</b>	10:38	22	was Ken called me to tell me it's cancelled.	10:41
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1	THE WITNESS: In the private meeting, he told	10:58	1	[Video presentation.]	11:02
2	me that he's -- he expressed a very completely	10:58	2	MR. GREIM: All right. That's the end of the	11:05
3	different view about Xi, about Communist Party.	10:58	3	clip.	11:05
4	BY MR. GREIM:	10:58	4	MR. GRENDI: I'm sorry. Objection. I just	11:05
5	<b>Q. What do you mean, a completely different</b>	10:58	5	don't understand. Are there two speakers on that or	11:05
6	<b>view?</b>	10:58	6	just one?	11:05
7	A. He's opposing Xi's dictatorship -- put	10:58	7	MR. GREIM: This was -- let me read some more	11:05
8	it that way -- strongly.	10:59	8	background on this. This was pulled from You Tube,	11:05
9	<b>Q. Sir, I'm going to play for you a video</b>	10:59	9	<a href="https://youtu.be/whKwLpKbUQ">https://youtu.be/whKwLpKbUQ</a> published April 29,	11:05
10	<b>of Mr. Guo speaking. I'm going to see if this is</b>	10:59	10	2017.	11:05
11	<b>something you have heard before and I'm going to see</b>	10:59	11	Let me ask the witness, first of all --	11:05
12	<b>if you at least recognize his voice.</b>	11:00	12	MR. GRENDI: Hold on.	11:05
13	A. Yeah.	11:00	13	BY MR. GREIM:	11:05
14	<b>Q. This will be in Chinese. So the court</b>	11:00	14	<b>Q. Do you recognize the voice on the</b>	11:05
15	<b>reporter will not be able to transcribe it.</b>	11:00	15	<b>recording?</b>	11:05
16	A. Okay.	11:00	16	MR. GRENDI: Objection. Are there two	11:05
17	<b>Q. However, I'm going to distribute a</b>	11:00	17	voices? I don't understand. It says Speaker 1.	11:05
18	<b>translation that we have already served on our</b>	11:00	18	MR. GREIM: Please don't interrupt the	11:05
19	<b>opposing counsel and I'll make it available to you as</b>	11:00	19	questioning. There's only one thing that says	11:06
20	<b>well. We are going to mark this as Han 3.</b>	11:00	20	Speaker 1. There are not two voices.	11:06
21	<b>[Han Exhibit No. 3 was</b>	11:00	21	MR. GRENDI: I don't know.	11:06
22	<b>marked for identification.]</b>	11:01	22	MR GREIM: Please don't interrupt. Please	11:06
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1	MR. GREIM: I'm going to arrange these	11:01	1	don't interrupt the questioning.	11:06
2	speakers so that, hopefully, everybody can hear this	11:01	2	MR. GRENDI: Objection to the entire line of	11:06
3	really well.	11:01	3	questioning. You may continue.	11:06
4	MR. GRENDI: Is this a certified translation?	11:01	4	MR. GAVENMAN: I object as well.	11:06
5	MR. GREIM: Yeah. The affidavit that you	11:01	5	BY MR. GREIM:	11:06
6	received goes with all of these. This has been	11:01	6	<b>Q. All right. Do you recognize the voice</b>	11:06
7	produced to you.	11:01	7	<b>on the recording, sir?</b>	11:06
8	MR. GRENDI: I got a lot of stuff in the last	11:01	8	A. Yes.	11:06
9	few days.	11:01	9	<b>Q. Whose voice is that?</b>	11:06
10	All right. On your representation this is	11:01	10	A. Miles.	11:06
11	certified translation, I would object to the extent	11:01	11	<b>Q. I'm sorry?</b>	11:06
12	it's not certified.	11:01	12	A. Miles.	11:06
13	MR. GREIM: Okay.	11:01	13	<b>Q. Miles?</b>	11:06
14	MR. GRENDI: Thank you.	11:01	14	A. Yes.	11:06
15	MR. GREIM: All right. And here we go. This	11:01	15	<b>Q. Have you heard any part of this before?</b>	11:06
16	is about a three-minute-and-one-second clip.	11:01	16	A. No. This is actually my first time.	11:06
17	Actually, the You Tube version of this, sir, has -- I	11:01	17	<b>Q. And did you hear in the opening that Mr.</b>	11:06
18	know someone from You Tube tried to translate it, and	11:01	18	<b>Guo said I have absolute faith in General Secretary</b>	11:06
19	just so you can see what I'm playing, I'm going to	11:02	19	<b>Xi?</b>	11:06
20	turn my computer screen around so that you can see	11:02	20	MR. GRENDI: Objection.	11:06
21	it. I know it's some distance from you, but I'm	11:02	21	THE WITNESS: Yes.	11:06
22	going to ahead and play.	11:02	22	BY MR. GREIM:	11:06
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1	<b>Q. Did you also hear him criticize certain</b>	11:06	1	MR. GAVENMAN: Objection to form.	11:07
2	<b>dissidents in the United States?</b>	11:06	2	BY MR. GREIM:	11:07
3	A. Yes.	11:06	3	<b>Q. By the way, were you following along</b>	11:07
4	MR. GAVENMAN: Objection to form.	11:06	4	<b>with the translation while you were listening?</b>	11:07
5	MR. GRENDI: Objection.	11:06	5	A. Yeah.	11:07
6	BY MR. GREIM:	11:06	6	<b>Q. Did you find the translation to be</b>	11:07
7	<b>Q. Have you heard him express similar views</b>	11:06	7	<b>generally accurate?</b>	11:07
8	<b>to you?</b>	11:06	8	MR. GRENDI: Objection.	11:07
9	MR. GAVENMAN: Objection to form.	11:06	9	THE WITNESS: No. I didn't look at English.	11:07
10	THE WITNESS: About Xi?	11:06	10	I just looked at the Chinese.	11:08
11	BY MR. GREIM:	11:06	11	BY MR. GREIM:	11:08
12	<b>Q. Let's start with Xi, about Xi.</b>	11:06	12	<b>Q. I see. Did you find the Chinese</b>	11:08
13	MR. GAVENMAN: Objection to form.	11:07	13	<b>transcription to be generally accurate?</b>	11:08
14	THE WITNESS: Never.	11:07	14	MR. GRENDI: Objection to form. He didn't	11:08
15	BY MR. GREIM:	11:07	15	read the English.	11:08
16	<b>Q. Have you heard him express similar views</b>	11:07	16	THE WITNESS: The Chinese, yes.	11:08
17	<b>regarding dissidents?</b>	11:07	17	BY MR. GREIM:	11:08
18	MR. GAVENMAN: Objection to form.	11:07	18	<b>Q. Does it surprise you that Guo made a</b>	11:08
19	MR. GRENDI: Objection.	11:07	19	<b>statement such as this?</b>	11:08
20	THE WITNESS: It depends on what dissidents	11:07	20	MR. GAVENMAN: Objection to form.	11:08
21	you are talking about.	11:07	21	MR. GRENDI: Objection to the form.	11:08
22	BY MR. GREIM:	11:07	22	THE WITNESS: No, not at all.	11:08
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1	<b>Q. So about some dissidents, he has</b>	11:07	1	BY MR. GREIM:	11:08
2	<b>expressed a similar view?</b>	11:07	2	<b>Q. Why not?</b>	11:08
3	MR. GAVENMAN: Objection to form.	11:07	3	A. Chinese politics --	11:08
4	MR. GRENDI: Objection to form.	11:07	4	MR. GAVENMAN: Objection.	11:08
5	THE WITNESS: Yes.	11:07	5	MR. GRENDI: Objection.	11:08
6	BY MR. GREIM:	11:07	6	THE WITNESS: -- are complicated. What he	11:08
7	<b>Q. Okay. What about -- I assume that he</b>	11:07	7	said on a public platform is not what he really	11:08
8	<b>has expressed similar views about Xi Nuo.</b>	11:07	8	intended to say. That's just my understanding and,	11:08
9	A. Yes.	11:07	9	also, activists in this community, not all of them	11:08
10	MR. GAVENMAN: Objection to form.	11:07	10	are real activists. Some are fake. Some are	11:08
11	MR. GRENDI: Objection to form.	11:07	11	actually working for the Chinese regime, including	11:08
12	BY MR. GREIM:	11:07	12	this guy, Xi Nuo.	11:09
13	<b>Q. Has he expressed to you that one of his</b>	11:07	13	BY MR. GREIM:	11:09
14	<b>goals is to punish certain dissidents in the United</b>	11:07	14	<b>Q. So you're aware the Xi Nuo works for the</b>	11:09
15	<b>States?</b>	11:07	15	<b>Chinese regime?</b>	11:09
16	A. He didn't --	11:07	16	A. Yes.	11:09
17	MR. GRENDI: Objection to form.	11:07	17	MR. GAVENMAN: Objection to form.	11:09
18	THE WITNESS: -- put it that way.	11:07	18	BY MR. GREIM:	11:09
19	BY MR. GREIM:	11:07	19	<b>Q. How do you know that?</b>	11:09
20	<b>Q. Did you hear him say in this tape that</b>	11:07	20	A. I have informant that provides that some	11:09
21	<b>they deserve to be punished?</b>	11:07	21	people work with Xi Nuo.	11:09
22	A. Yes.	11:07	22	<b>Q. Let's -- you know what? Let's stop</b>	11:09
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1	<b>there, because everybody -- most people at this</b>	11:09	1	suing others. It's the other side suing him as well.	11:11
2	<b>table, I think, have the same goals and there are --</b>	11:09	2	BY MR. GREIM:	11:11
3	<b>we probably do not need to get into the answer to</b>	11:09	3	<b>Q. Is it your testimony that every</b>	11:11
4	<b>that question.</b>	11:09	4	<b>dissident that Mr. Guo is in litigation with -- well,</b>	11:11
5	<b>Okay. There's just no need to do that here.</b>	11:09	5	<b>let me back up. That's a closed question.</b>	11:11
6	A. Okay.	11:09	6	<b>Let me just ask you this.</b>	11:11
7	MR. GRENDI: Wait. Stop.	11:09	7	A. Yeah.	11:12
8	MR. PODHASKIE: It's one of his best friends	11:09	8	<b>Q. Are you aware of whether Mr. Guo is in</b>	11:12
9	on Twitter. Let him go on and explain.	11:09	9	<b>litigation with any dissident who is not working with</b>	11:12
10	MR. GRENDI: Hold on, Dan. You don't have an	11:09	10	<b>the Chinese regime?</b>	11:12
11	appearance here.	11:09	11	MR. GAVENMAN: Objection to form.	11:12
12	MR. GREIM: I would ask Mr. Podhaskie to	11:09	12	MR. GRENDI: Objection to form.	11:12
13	please stop interfering with the deposition.	11:09	13	THE WITNESS: I'm not sure. I think there	11:12
14	MR. GAVENMAN: As Mr. Han's counsel, he has	11:09	14	are lots of them working with the regime, because	11:12
15	to be allowed to answer the question completely. You	11:09	15	they, themselves, cannot afford this large amount	11:12
16	asked a question. He can answer.	11:10	16	legal bill. Nobody wants to pay that.	11:12
17	MR. GREIM: Fair enough. Fair enough. I	11:10	17	BY MR. GREIM:	11:12
18	detected some hesitance and I wanted to signal to the	11:10	18	<b>Q. As you said earlier, could some of these</b>	11:12
19	witness that we didn't need to hear it, but if you	11:10	19	<b>dissidents be trying in their own way to use the</b>	11:12
20	would like to finish the answer, go ahead.	11:10	20	<b>regime?</b>	11:12
21	MR. GAVENMAN: Please complete you answer,	11:10	21	MR. GAVENMAN: Objection, form.	11:12
22	Mr. Han.	11:10	22	MR. GRENDI: Objection to form.	11:12
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1	THE WITNESS: Ys. We have evidence that Xi	11:10	1	MR. GAVENMAN: Foundation.	11:12
2	Nuo is working with the Chinese regime. I have	11:10	2	THE WITNESS: Yes.	11:12
3	submitted that evidence to the FBI.	11:10	3	BY MR. GREIM:	11:12
4	BY MR. GREIM:	11:10	4	<b>Q. Earlier, we talked a little bit about</b>	11:12
5	<b>Q. By the way, was there anything that you</b>	11:10	5	<b>the visit by Chinese authorities to Mr. Guo in the</b>	11:13
6	<b>heard in the clip that was inaudible to you or that</b>	11:10	6	<b>United States.</b>	11:13
7	<b>you did not understand?</b>	11:10	7	A. Yeah.	11:13
8	A. No.	11:10	8	<b>Q. Do you recall when that occurred?</b>	11:13
9	<b>Q. Are you aware that Mr. Guo has filed</b>	11:10	9	A. I didn't.	11:13
10	<b>several lawsuits against dissidents in the United</b>	11:11	10	<b>Q. Does May 2017 sound correct to you?</b>	11:13
11	<b>States?</b>	11:11	11	A. Yes.	11:13
12	MR. GAVENMAN: Objection to form.	11:11	12	MR. GAVENMAN: Objection to form.	11:13
13	MR. GRENDI: Objection to form.	11:11	13	MR. GRENDI: Objection to form.	11:13
14	THE WITNESS: Yes.	11:11	14	BY MR. GREIM:	11:13
15	BY MR. GREIM:	11:11	15	<b>Q. Is that one of the -- did part of your</b>	11:13
16	<b>Q. And have you advised Mr. Guo on those</b>	11:11	16	<b>research into Mr. Guo involve reading accounts of the</b>	11:13
17	<b>lawsuits?</b>	11:11	17	<b>visit by Chinese officials to Guo's apartment?</b>	11:13
18	MR. GAVENMAN: Objection to form.	11:11	18	MR. GRENDI: Objection.	11:14
19	THE WITNESS: No, but I did ask him not to	11:11	19	THE WITNESS: Yes.	11:14
20	get involved, because my reason is this is Chinese	11:11	20	BY MR. GREIM:	11:14
21	Communist regime strategy, to get him involved in the	11:11	21	<b>Q. And did Guo also discuss the visit with</b>	11:14
22	lawsuit, consume his resources. It's not just him	11:11	22	<b>you?</b>	11:14
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1	A. That was with the counsel.	11:14	1	MR. GREIM: Sure, but whether Mr. Guo has	11:15
2	<b>Q. With counsel?</b>	11:14	2	recordings of these meetings is not a privileged	11:15
3	A. Yes.	11:14	3	matter. Is it a fact. It either happened or it did	11:16
4	<b>Q. Okay. By the way, just to -- I want to</b>	11:14	4	not.	11:16
5	<b>be clear about this. Who were the names of the Clark</b>	11:14	5	THE WITNESS: I didn't know that.	11:16
6	<b>Hill attorneys who were involved in that matter? Do</b>	11:14	6	MR. GAVENMAN: Please don't reveal anything	11:16
7	<b>you remember?</b>	11:14	7	that you learned in a privileged conversation.	11:16
8	MR. GREIM: Objection.	11:14	8	THE WITNESS: Yeah. I didn't know whatever	11:16
9	THE WITNESS: Thomas Ragland.	11:14	9	public information, but all I know is what I learned	11:16
10	BY MR. GREIM:	11:14	10	from the counsel regarding the meetings.	11:16
11	<b>Q. Okay.</b>	11:14	11	[Han Exhibit No. 4 was	11:16
12	A. It's public information, by the way.	11:14	12	marked for identification.]	11:16
13	<b>Q. Jay Johnson, was he one of them?</b>	11:14	13	BY MR. GREIM:	11:16
14	A. Never heard of him.	11:14	14	<b>Q. I'm going to show you what we're marking</b>	11:16
15	<b>Q. Are you aware that Mr. Guo recorded all</b>	11:14	15	<b>as Exhibit 4, and you'll see this is a "Wall Street</b>	11:16
16	<b>or large portions of those meetings?</b>	11:15	16	<b>Journal" article from October 22, 2017 and it goes on</b>	11:17
17	MR. GAVENMAN: Objection --	11:15	17	<b>for about six pages.</b>	11:17
18	MR. GREIM: Objection.	11:15	18	A. Right.	11:17
19	MR. GAVENMAN: -- to form. You're talking	11:15	19	<b>Q. But you'll see that the main topic here</b>	11:17
20	about a privileged conversation?	11:15	20	<b>is about the visit of the Chinese officials to Mr.</b>	11:17
21	MR. GREIM: No. I'm sorry. Let me -- not	11:15	21	<b>Guo.</b>	11:17
22	meetings with Clark Hill.	11:15	22	A. Right.	11:17
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1	MR. GAVENMAN: Okay.	11:15	1	<b>Q. Correct?</b>	11:17
2	BY MR. GREIM:	11:15	2	A. Um-hum.	11:17
3	<b>Q. Are you aware that Mr. Guo recorded all</b>	11:15	3	<b>Q. And is that a picture of Mr. Guo at the</b>	11:17
4	<b>or portions of his meetings with Chinese officials?</b>	11:15	4	<b>top there?</b>	11:17
5	MR. GAVENMAN: Objection.	11:15	5	A. Yes.	11:17
6	MR. GREIM: Objection to form, relevance.	11:15	6	<b>Q. Is that taken in his Sherry Netherland</b>	11:17
7	THE WITNESS: With the counsel. That was	11:15	7	<b>apartment?</b>	11:17
8	also with counsel.	11:15	8	MR. GREIM: Objection.	11:17
9	BY MR. GREIM:	11:15	9	THE WITNESS: It looks like it.	11:17
10	<b>Q. I'm sorry. I could not actually hear</b>	11:15	10	BY MR. GREIM:	11:17
11	<b>your answer over the objections. You're saying, yes,</b>	11:15	11	<b>Q. All right. Do you see in the third</b>	11:17
12	<b>he recorded meetings with counsel?</b>	11:15	12	<b>paragraph, it says: "Liu Yanping, the lead official,</b>	11:17
13	<b>MR. GAVENMAN: No.</b>	11:15	13	<b>said he had come on behalf of Beijing 'to find a</b>	11:17
14	THE WITNESS: No. I said that's information	11:15	14	<b>solution', according to Mr. Guo and a partial audio</b>	11:18
15	--	11:15	15	<b>recording Mr. Guo said he made of the May encounter</b>	11:18
16	MR. GAVENMAN: Mr. Han. Mr. Han.	11:15	16	<b>and posted online in September."</b>	11:18
17	So what he's saying is, again, there was	11:15	17	<b>Do you see that?</b>	11:18
18	conversations with counsel present that were	11:15	18	A. Um-hum.	11:18
19	privileged conversations where he discussed this	11:15	19	<b>Q. Now let me ask you -- I don't want to</b>	11:18
20	material. So he cannot get into that area. That's	11:15	20	<b>know -- well, unfortunately, you've got this</b>	11:18
21	what he's saying.	11:15	21	<b>continuing instruction and if you heard it from</b>	11:18
22	Please do not answer.	11:15	22	<b>counsel, you can't even state the facts. I'm going</b>	11:18
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1	<b>to ask you whether you recall reading articles like</b>	11:18	1	THE WITNESS: That is with the counsel in the	11:20
2	<b>this about Mr. Guo's recording of the May encounter.</b>	11:18	2	meeting.	11:20
3	MR. GRENDI: Objection.	11:18	3	MR. GREIM: Wait a minute. Wait, wait, wait.	11:20
4	THE WITNESS: This is the first time I read	11:18	4	Now, whether he's listened to it is not	11:20
5	this article.	11:18	5	privileged information. I'm not going to ask him the	11:20
6	BY MR. GREIM:	11:18	6	content of it, but it's a yes or no question -- yes	11:21
7	<b>Q. Okay. Well, when you first met Mr. Guo,</b>	11:18	7	or no answer whether he has listened to it. I don't	11:21
8	<b>I suppose this had already happened, hadn't it?</b>	11:18	8	want to know anything else about the circumstance.	11:21
9	<b>Because you said you met him for the first time in</b>	11:19	9	MR. GAVENMAN: I'm also very concerned here	11:21
10	<b>July or August?</b>	11:19	10	about attorney work product privilege and what's	11:21
11	A. Correct.	11:19	11	happening in that case. I mean, it's not just the	11:21
12	MR. GRENDI: Objection.	11:19	12	facts. It's not just what communications. There's	11:21
13	BY MR. GREIM:	11:19	13	attorney work product that's happening here, clearly,	11:21
14	<b>Q. By the way, have you met Steven Bannon</b>	11:19	14	and you need to stay away from it.	11:21
15	<b>before?</b>	11:19	15	You need to stay away. I don't know why	11:21
16	MR. GRENDI: Objection. What does that have	11:19	16	you're bothering to go in there anyway, recordings,	11:21
17	to do with this case, Counsel? I'm sorry, but Steve	11:19	17	not recordings. I mean, we don't need to be invading	11:21
18	Bannon, where does he come in? I just don't get it.	11:19	18	this privilege to get to the facts of this case.	11:21
19	MR. GREIM: Read the counterclaim.	11:19	19	I mean, we're going to have a long day here	11:21
20	MR. GRENDI: I have. You put in stuff about	11:19	20	if we're doing this and let's stay away from	11:21
21	Steve Bannon that has nothing to do with the case.	11:19	21	privileged information and get to the parts that	11:21
22	MR. GREIM: Please don't use up our time on	11:19	22	matter, please.	11:21
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1	the record.	11:19	1	MR. GREIM: Well, we disagree to your claims	11:21
2	Go ahead.	11:19	2	of privilege. We're just trying to work around them	11:21
3	THE WITNESS: Before this?	11:19	3	so that we can get through.	11:21
4	BY MR. GREIM:	11:19	4	BY MR. GREIM:	11:21
5	<b>Q. Yes.</b>	11:19	5	<b>Q. Did you -- let me -- okay. Let's go a</b>	11:21
6	A. Before what?	11:19	6	<b>little further.</b>	11:22
7	<b>Q. Well, let's say when did you -- have you</b>	11:19	7	<b>Why did you say that this incident of Mr. Guo</b>	11:22
8	<b>worked with Mr. Bannon in connection with Mr. Guo?</b>	11:19	8	<b>meeting with the Chinese officials may have been a</b>	11:22
9	MR. GAVENMAN: Objection to form.	11:19	9	<b>turning point for Mr. Guo?</b>	11:22
10	MR. GRENDI: Objection.	11:19	10	MR. GRENDI: Objection.	11:22
11	THE WITNESS: Bannon was introduced to him on	11:19	11	MR. GAVENMAN: Objection.	11:22
12	October, early October of 2017.	11:19	12	THE WITNESS: I think because they were	11:22
13	BY MR. GREIM:	11:19	13	arrested, detained by the FBI. I think the Chinese	11:22
14	<b>Q. By you?</b>	11:19	14	official may have believed that Miles sold them out	11:22
15	A. By Bill Gertz, not me.	11:19	15	and that he's working with American Government,	11:23
16	<b>Q. Now, how do you know that?</b>	11:20	16	busted them, take away their cellphones, computers.	11:23
17	A. Because I was with them.	11:20	17	Yeah.	11:23
18	<b>Q. Okay. Have you ever listened to a</b>	11:20	18	BY MR. GREIM:	11:23
19	<b>recording of Mr. Guo's meeting with Chinese</b>	11:20	19	<b>Q. All right. So that's -- I understand</b>	11:23
20	<b>officials?</b>	11:20	20	<b>that's what you think the Chinese officials may</b>	11:23
21	MR. GRENDI: Objection.	11:20	21	<b>believe.</b>	11:23
22	MR. GAVENMAN: Objection.	11:20	22	A. Right.	11:23
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1	<b>Q. Now my next question is how do you know</b>	11:23	1	THE WITNESS: I don't know. This is a little	11:25
2	<b>-- what makes you believe that? What facts do you</b>	11:23	2	too far, you know.	11:25
3	<b>have that form the basis for that belief?</b>	11:23	3	MR. GRENDI: I'm just going to hop in here.	11:25
4	MR. GAVENMAN: Objection to form.	11:23	4	If we went to the judge with this right now, she	11:25
5	MR. GRENDI: Objection.	11:23	5	would say why are you asking these questions, please	11:25
6	THE WITNESS: I think since then, there was a	11:23	6	move it along. I'm pretty sure that's what she would	11:25
7	-- as far as I can tell, the Chinese never sent	11:23	7	say, because this has zero connection to whether or	11:25
8	another team to communicate with Miles, just on my	11:23	8	not Eastern Profit --	11:26
9	knowledge, based on my best knowledge.	11:23	9	THE WITNESS: Can I get some water?	11:26
10	BY MR. GREIM:	11:24	10	MR. GRENDI: -- and Strategic Vision --	11:26
11	<b>Q. Since then, has Guo sent anyone to China</b>	11:24	11	MR. GREIM: Why don't we do this. We have	11:26
12	<b>to communicate with Chinese officials?</b>	11:24	12	five minutes left. I mean, this goes directly to	11:26
13	A. I don't know.	11:24	13	whether Mr. Guo is working with the regime or not.	11:26
14	MR. GRENDI: Objection.	11:24	14	This would be one of the contacts, but let's take a	11:26
15	MR. GAVENMAN: Objection to form.	11:24	15	break. We have five minutes left on the tape. Let's	11:26
16	THE WITNESS: I have no knowledge.	11:24	16	take about a five- or ten-minute break.	11:26
17	BY MR. GREIM:	11:24	17	VIDEOGRAPHER: This end Disk No. 1, going off	11:26
18	<b>Q. Do you know whether Guo sent Steve</b>	11:24	18	the record. The time is now 11:28 a.m.	11:26
19	<b>Bannon to communicate with Wang Qishan?</b>	11:24	19	[Recess.]	11:41
20	MR. GAVENMAN: Objection.	11:24	20	VIDEOGRAPHER: This begins Disk No. 2 in the	11:41
21	MR. GRENDI: Objection, relevance.	11:24	21	video deposition of Lianchao Han. We are back on the	11:41
22	THE WITNESS: That's not possible.	11:24	22	record. The time is 11:43 a.m.	11:41
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1	BY MR. GREIM:	11:24	1	BY MR. GREIM:	11:41
2	<b>Q. Why do you say that?</b>	11:24	2	<b>Q. Okay. Mr. Han --</b>	11:41
3	A. Wang Qishan invited Bannon to China	11:24	3	A. Yes.	11:41
4	before he even know who Miles Kwok is.	11:24	4	<b>Q. -- I'm going to make sure something is</b>	11:41
5	<b>Q. Before who knows who Miles Kwok was?</b>	11:24	5	<b>very clear from our last series of questions. Is it</b>	11:41
6	A. Before Steve had ever heard his name.	11:24	6	<b>true that you have knowledge of the purpose of the</b>	11:42
7	<b>Q. How do you know that?</b>	11:24	7	<b>Bannon trip to Wang Qishan?</b>	11:42
8	A. Because at the time, he was -- the	11:24	8	MR. GRENDI: Objection.	11:42
9	timeline, just look at the timeline. I forgot when	11:24	9	MR. GAVENMAN: Objection.	11:42
10	he went to China, but that was way before Steve met	11:25	10	You can answer.	11:42
11	with the Miles Kwok.	11:25	11	THE WITNESS: I don't know exactly what's the	11:42
12	<b>Q. Do you know who arranged the Bannon-Wang</b>	11:25	12	purpose, but I know for a fact it has nothing to do	11:42
13	<b>Qishan meeting?</b>	11:25	13	with Miles Kwok.	11:42
14	MR. GRENDI: Objection.	11:25	14	BY MR. GREIM:	11:42
15	MR. GAVENMAN: Objection.	11:25	15	<b>Q. Well, now that you -- I have to ask you</b>	11:42
16	THE WITNESS: Is that relevant? I think John	11:25	16	<b>how do you know for a fact it has nothing to do with</b>	11:42
17	Thornton.	11:25	17	<b>it?</b>	11:42
18	BY MR. GREIM:	11:25	18	A. Because Steve talked to me about his	11:42
19	<b>Q. And do you know whether Bannon discussed</b>	11:25	19	trip.	11:42
20	<b>Guo with Wang Qishan?</b>	11:25	20	<b>Q. Okay. What did he tell you? What did</b>	11:42
21	MR. GAVENMAN: Objection.	11:25	21	<b>he tell you the purpose of the trip was?</b>	11:42
22	MR. GRENDI: Objection. How would he know?	11:25	22	MR. GRENDI: Objection. Why are we talking	11:42
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1	about a trip when the witness just said it has	11:42	1	<b>that I can show you here in a moment, but I just want</b>	11:45
2	nothing to do with this case?	11:42	2	<b>you to take a look at this and tell me whether, now</b>	11:46
3	MR. GREIM: Well, he said it doesn't. He was	11:42	3	<b>having looked through this document, you have ever</b>	11:46
4	about to tell us why it doesn't.	11:42	4	<b>heard of it or seen it before.</b>	11:46
5	THE WITNESS: First of all, Steve didn't know	11:42	5	A. Never heard, never seen this before.	11:46
6	Miles. He never heard of Miles before this trip. I	11:42	6	Can I see the Chinese version?	11:46
7	mean during this during this trip.	11:42	7	<b>Q. Yes. I'm going to play for you a</b>	11:46
8	He met with Miles on October 6th, I think I	11:42	8	<b>newscast with, I believe, the Mirror in which Mr.</b>	11:46
9	believe of 2017. So he didn't know, and that meeting	11:42	9	<b>Wengui discusses -- I'm sorry -- Mr. Guo discusses</b>	11:46
10	was about economic nationalism. Wang Qishan lectured	11:43	10	<b>the letter. I'm going to go ahead for our counsel</b>	11:46
11	him for the entire session of his meeting. That's	11:43	11	<b>here and I'm going to go ahead and mark as Exhibit 6</b>	11:46
12	what Bannon told me.	11:43	12	<b>a transcription and translation of that. Again, this</b>	11:46
13	BY MR. GREIM:	11:43	13	<b>has been previously produced to counsel and the</b>	11:47
14	<b>Q. Is that the extent of your knowledge</b>	11:43	14	<b>translation is accompanied with an affidavit of the</b>	11:47
15	<b>about the trip?</b>	11:43	15	<b>translator, Jessica Ju. This is from</b>	11:47
16	A. Correct.	11:43	16	<b>https://youtu.be/7qVmEsw_ZX8, and it was published on</b>	11:47
17	<b>Q. All right. Have you ever discussed the</b>	11:43	17	<b>January 18, 2018.</b>	11:47
18	<b>trip with Guo Wengui?</b>	11:43	18	<b>What I'm going to do, sir, is I'm going to try</b>	11:47
19	A. No, because the meeting, you know, what	11:43	19	<b>to make sure you can see my screen, because the</b>	11:47
20	Steve and Miles, when we sit down, Steve told what	11:43	20	<b>newscast --</b>	11:47
21	happened.	11:43	21	<b>[Video presentation.]</b>	11:47
22	<b>Q. Okay. I'm sorry. Steve told Miles what</b>	11:43	22	MR. GREIM: I'm pausing it. What I'm going	11:48
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1	<b>happened?</b>	11:43	1	to do is move my computer closer to you without	11:48
2	A. Steve, me, Miles, we have a dinner,	11:43	2	wrecking the entire setup that we have here.	11:48
3	several dinners. So I think at the beginning, you	11:44	3	THE WITNESS: Yeah. Oh, that's the Chinese	11:48
4	know, he mentioned about this trip. He described the	11:44	4	version?	11:48
5	meeting with Wang Qishan.	11:44	5	MR. GREIM: Yes, sir, but I just encourage	11:48
6	<b>Q. Are you aware of a letter that Mr. Guo</b>	11:44	6	you to listen, and if there were even a way for you	11:48
7	<b>wrote to President Xi in August of 2017?</b>	11:44	7	to pause as you need to --	11:48
8	A. I didn't.	11:44	8	THE WITNESS: Yeah.	11:48
9	<b>Q. Have you ever heard of that before?</b>	11:44	9	MR. GREIM: -- I'll try to allow that.	11:48
10	A. No.	11:44	10	THE WITNESS: Okay.	11:48
11	[Han Exhibit No. 5 was	11:44	11	MR. GREIM: And what you may do is, if you	11:48
12	marked for identification.]	11:45	12	know how to work this --	11:48
13	BY MR. GREIM:	11:45	13	THE WITNESS: That's fine. I can listen.	11:48
14	<b>Q. I'm going to show you what we are</b>	11:45	14	MR. GREIM: Okay.	11:48
15	<b>marking as Exhibit 5, and what I'm showing you here</b>	11:45	15	[Video presentation.]	11:49
16	<b>is a certified translation that was filed in the New</b>	11:45	16	THE WITNESS: This is a half an hour thing.	11:49
17	<b>York County Supreme Court in another matter, and this</b>	11:45	17	Are we going to go through everything?	11:49
18	<b>purports to be a letter from Guo Wengui to the</b>	11:45	18	[Mr. Greim gestures in the negative.]	11:50
19	<b>Honorable Leader, parentheses "S". It starts with</b>	11:45	19	[Continued video presentation.]	11:53
20	<b>"Greetings" and it's signed, Respectfully, s/Guo</b>	11:45	20	MR. GREIM: All right. I have stopped this	11:56
21	<b>Wengui, August 26, 2017.</b>	11:45	21	exactly at seven minutes and thirty seconds. As the	11:56
22	<b>Now, I've got an actual Chinese copy of this</b>	11:45	22	witness points out, this particular clip is a total	11:56
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1	of about 23 minutes and eventually goes to 31:43. We	11:56	1	THE WITNESS: Just exactly the same letter,	11:58
2	won't play the entire clip here, but we can if it's	11:56	2	just done into segments.	11:58
3	necessary.	11:56	3	BY MR. GREIM:	11:58
4	BY MR. GREIM:	11:56	4	<b>Q. Okay. And so let me ask you again, now</b>	11:58
5	<b>Q. So my question to the witness, first of</b>	11:56	5	<b>that you've seen it in Chinese --</b>	11:58
6	<b>all, is that -- what did you see, first of all, on</b>	11:56	6	A. Yeah.	11:58
7	<b>the video?</b>	11:56	7	<b>Q. -- and you've heard Mr. Guo talking</b>	11:58
8	A. What did I see?	11:56	8	<b>about it, had you ever heard of this letter before</b>	11:58
9	<b>Q. Sure.</b>	11:56	9	<b>today?</b>	11:58
10	MR. GRENDI: I'll just object to line of	11:56	10	MR. GAVENMAN: Objection, form.	11:58
11	questioning.	11:56	11	THE WITNESS: No. This is the first time I	11:58
12	THE WITNESS: Just, you know, it's his letter	11:56	12	saw this video clip. I didn't know the letter.	11:58
13	to the Chinese leaders and he explains who he	11:56	13	BY MR. GREIM:	11:58
14	addressed it to.	11:56	14	<b>Q. Okay. Well, if we could go to the</b>	11:58
15	BY MR. GREIM:	11:56	15	<b>English version --</b>	11:58
16	<b>Q. And who is interviewing Mr. Guo?</b>	11:56	16	A. Yes.	11:58
17	A. Chen Xiaoping.	11:57	17	<b>Q. -- you'll see that the beginning of the</b>	11:58
18	<b>Q. Who is that?</b>	11:57	18	<b>letter after the word "Greetings" says: "Thank you</b>	11:58
19	A. Chen Xiaoping is the host of Mirror Tv.	11:57	19	<b>very much for your hospitality to meet members of my</b>	11:58
20	<b>Q. This is the TV program you mentioned</b>	11:57	20	<b>family and staff yesterday."</b>	11:59
21	<b>earlier?</b>	11:57	21	<b>Do you see that?</b>	11:59
22	A. Correct.	11:57	22	A. Yes.	11:59
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1	<b>Q. All right. And do you recognize Mr. Guo</b>	11:57	1	MR. GAVENMAN: I'm just going to object to	11:59
2	<b>and Mr. Guo's voice answering his questions?</b>	11:57	2	the extent this is not an accurate translation, just	11:59
3	A. Yes.	11:57	3	to that extent, but we can go on.	11:59
4	<b>Q. And did you hear Mr. Guo to ask the host</b>	11:57	4	MR. GRENDI: Same objection.	11:59
5	<b>that the letter be put up on the screen?</b>	11:57	5	BY MR. GREIM:	11:59
6	A. Correct.	11:57	6	<b>Q. Now, we can go back to Chinese text, if</b>	11:59
7	MR. GRENDI: Objection.	11:57	7	<b>you would like, sir, to take a look at the --</b>	11:59
8	BY MR. GREIM:	11:57	8	A. Yeah. Let's go back and see exactly. I	11:59
9	<b>Q. And did you see the letter?</b>	11:57	9	think there is a mistranslation here. I can see at	11:59
10	A. Yes.	11:57	10	least one error here, but that's the Chinese -- the	11:59
11	<b>Q. How many pages did it have?</b>	11:57	11	English version. It's the beginning of the letter, I	11:59
12	A. Four or five. Four.	11:57	12	think.	12:00
13	<b>Q. Were you able to read it in Chinese?</b>	11:57	13	<b>Q. You're now looking at the beginning of</b>	12:00
14	A. Yes.	11:57	14	<b>the letter?</b>	12:00
15	<b>Q. And then after the actual letter was</b>	11:57	15	A. Yeah. Can we enlarge this a little bit?	12:00
16	<b>shown, did you see a transcription that followed</b>	11:57	16	<b>Q. I'm afraid we can't.</b>	12:00
17	<b>while some piano music played?</b>	11:57	17	A. I can't read it.	12:00
18	A. Yes.	11:57	18	<b>Q. Let me see if I can, sir.</b>	12:00
19	<b>Q. What were Chinese characters in the</b>	11:57	19	A. There it goes.	12:00
20	<b>transcription after the letter?</b>	11:57	20	<b>Q. And you can feel free to use my controls</b>	12:00
21	MR. GRENDI: Objection.	11:57	21	<b>on the my computer to move. We may have a few other</b>	12:00
22	MR. GAVENMAN: Objection.	11:57	22	<b>questions on other pages here.</b>	12:00
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1	[Witness peruses document.]	12:00	1	translation.	12:03
2	THE WITNESS: Yeah.	12:00	2	BY MR. GREIM:	12:03
3	BY MR. GREIM:	12:01	3	<b>Q. Well, what -- which of those conditions,</b>	12:03
4	<b>Q. So was there a mistranslation in the</b>	12:01	4	<b>are any of the conditions inaccurate in the</b>	12:03
5	<b>transcription that I showed you?</b>	12:01	5	<b>transcription?</b>	12:03
6	A. Just for this part, no, for the first	12:01	6	A. Yeah. Roughly, it's correct, but he's	12:03
7	paragraph.	12:01	7	talking about like overseas, to stop overseas use the	12:03
8	<b>Q. Okay. Now, are you aware of a -- other</b>	12:01	8	army. He uses a specific term, sui jin. Sui jin	12:03
9	<b>than the meeting that we talked about earlier in May,</b>	12:01	9	means -- how to translate?	12:03
10	<b>are you aware of another meeting between Mr. Guo and</b>	12:01	10	Sui jin is the Communist hired thugs or hired	12:03
11	<b>any Chinese officials?</b>	12:01	11	crowds that's suing him. So that was not translated	12:03
12	A. No.	12:01	12	accurately.	12:04
13	<b>Q. Do you see under paragraph 1 of the</b>	12:01	13	<b>Q. I see. So does that apply to the phrase</b>	12:04
14	<b>English translation, under paragraph 1, Mr. Guo is</b>	12:01	14	<b>that says "drop the illegal action that is being</b>	12:04
15	<b>making certain requests of the Chinese leaders? Are</b>	12:01	15	<b>taken against me overseas"?</b>	12:04
16	<b>you aware of him having made such requests in or</b>	12:01	16	A. Yeah, but he's specifically -- by those	12:04
17	<b>around August of 2017?</b>	12:01	17	hired, you know, sui jin, army of Communist Party.	12:04
18	MR. GRENDI: Objection.	12:01	18	<b>Q. Let me take you to the first -- if you</b>	12:04
19	MR. GAVENMAN: Objection, form.	12:01	19	<b>continue in that paragraph, there are some text in</b>	12:04
20	THE WITNESS: I didn't know he made any	12:01	20	<b>bold. It's in bold both in Chinese characters and in</b>	12:04
21	requests, specific requests, like that, but I know	12:01	21	<b>English translation.</b>	12:04
22	there were -- he tried to negotiation -- tried to	12:02	22	A. Yeah.	12:04
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1	negotiate to protect his employees, his assets.	12:02	1	<b>Q. And it says: "My current situation can</b>	12:04
2	That, I know in general.	12:02	2	<b>be summed up in eight Chinese characters", colon and</b>	12:04
3	BY MR. GREIM:	12:02	3	<b>then after that, it's bolded: "I am now doing things</b>	12:04
4	<b>Q. If you look on -- let's go to the second</b>	12:02	4	<b>not out of my own volition and talking things that I</b>	12:04
5	<b>paragraph. You'll see he says: "The key condition</b>	12:02	5	<b>do not really mean."</b>	12:04
6	<b>for me to desist from revealing information is that</b>	12:02	6	<b>Do you see that?</b>	12:05
7	<b>you take my name off the Red Notice --</b>	12:02	7	A. I saw that.	12:05
8	A. Yes.	12:02	8	<b>Q. Is that a correct Chinese translation?</b>	12:05
9	<b>Q. -- "permit me to resume the operation of</b>	12:02	9	A. Roughly, yes.	12:05
10	<b>my business in Hong Kong and drop the legal action</b>	12:02	10	<b>Q. Did Mr. Guo ever express a similar</b>	12:05
11	<b>that is being taken against me overseas."</b>	12:02	11	<b>sentiment to you?</b>	12:05
12	<b>Did I read that correctly?</b>	12:02	12	MR. GRENDI: Objection.	12:05
13	A. Yes.	12:02	13	BY MR. GREIM:	12:05
14	<b>Q. And can you satisfy yourself that that</b>	12:02	14	<b>Q. About his speech in the United States?</b>	12:05
15	<b>is, in fact, what's in the Chinese version of the</b>	12:02	15	MR. GAVENMAN: Objection, form.	12:05
16	<b>letter?</b>	12:02	16	MR. GRENDI: Objection.	12:05
17	<b>And if you need to, if it's not on this page,</b>	12:02	17	THE WITNESS: No.	12:05
18	<b>we can toggle to the next.</b>	12:02	18	BY MR. GREIM:	12:05
19	A. Okay.	12:03	19	<b>Q. Then if you go on, there's some more</b>	12:05
20	[Witness peruses document.]	12:03	20	<b>that's bolded. I want to ask you about the English</b>	12:05
21	THE WITNESS: It's roughly correct, but it's	12:03	21	<b>sentence that says: "My public exposures of</b>	12:05
22	not straight -- you know, it's not an accurate	12:03	22	<b>information before."</b>	12:05
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1	A. Where is that?	12:05	1	<b>very end and then we're just about done with this,</b>	12:07
2	<b>Q. It's about two sentences later?</b>	12:05	2	<b>sir.</b>	12:08
3	A. Here, in the English?	12:05	3	A. All right.	12:08
4	<b>Q. Oh, yes, in the English. I'm just going</b>	12:05	4	<b>Q. If you go to page 5 of the</b>	12:08
5	<b>to point out to you.</b>	12:05	5	<b>transcription -- actually, I think it's really page</b>	12:08
6	A. Okay.	12:05	6	<b>3. Sorry. You'll see that there is a little six.</b>	12:08
7	<b>Q. "My public exposures of information</b>	12:05	7	A. Yeah.	12:08
8	<b>before was done under coercion. My choice to perform</b>	12:05	8	<b>Q. It says "A few".</b>	12:08
9	<b>publicly was not voluntary."</b>	12:05	9	A. Yes.	12:08
10	<b>Do you see that in the Chinese?</b>	12:05	10	<b>Q. Actually, before we get there, it's</b>	12:08
11	A. Yeah. It's not a very accurate	12:05	11	<b>really under five. I apologize. You'll see it says:</b>	12:08
12	translation.	12:06	12	<b>"I will put our national interest first and I am</b>	12:08
13	<b>Q. Okay. How would you, if you could --</b>	12:06	13	<b>willing to devote my life to protecting our nation's</b>	12:08
14	<b>what is inaccurate about it?</b>	12:06	14	<b>interest to defend Chairman Xi Jinping's value as our</b>	12:08
15	MR. GAVENMAN: Objection to form.	12:06	15	<b>nation's core faith and make ultimate dedication of</b>	12:08
16	MR. GRENDI: Objection.	12:06	16	<b>myself to safeguard Chairman Xi Jinping."</b>	12:08
17	THE WITNESS: Let's see. So he basically	12:06	17	<b>Did I read that correctly?</b>	12:08
18	says they hold the entire situation, it's not alone I	12:06	18	A. Yes, you read that correctly, but let me	12:08
19	can decide and control, and it's involved with my --	12:06	19	just see what's the Chinese version.	12:08
20	the country I reside in and other relevant interests,	12:06	20	<b>Q. Absolutely. Let's go there.</b>	12:08
21	stakeholders.	12:06	21	<b>[Video presentation.]</b>	12:09
22	BY MR. GREIM:	12:06	22	THE WITNESS: This is No. 5?	12:09
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1	<b>Q. That actually wasn't the sentence I read</b>	12:06	1	BY MR. GREIM:	12:09
2	<b>to you, but I see that.</b>	12:06	2	<b>Q. Yes, sir. Do we need to go to another</b>	12:09
3	A. Right. Right, but after that, he says,	12:06	3	<b>page?</b>	12:09
4	you know, like the whistle-blowing exposure before	12:06	4	A. No, no. This is the page.	12:09
5	was forced and also like a reluctant choice.	12:07	5	[Witness peruses document.]	12:09
6	<b>Q. I see.</b>	12:07	6	THE WITNESS: Yeah. I get it.	12:10
7	A. So that would be my understanding of the	12:07	7	BY MR. GREIM:	12:10
8	translation.	12:07	8	<b>Q. Is that an accurate translation?</b>	12:10
9	<b>Q. So instead of done under coercion and</b>	12:07	9	MR. GRENDI: Objection.	12:10
10	<b>was not voluntary, you would say forced?</b>	12:07	10	THE WITNESS: It's not -- you know, I think	12:10
11	A. Yes, because how you translate the whole	12:07	11	it's exaggerated a little bit on the side of -- yeah.	12:10
12	paragraph, the context of the thing.	12:07	12	It's a different tone, yeah, different. The scale of	12:10
13	<b>Q. Did Mr. Guo ever tell you that he felt</b>	12:07	13	emphasis, yeah, roughly correct.	12:10
14	<b>he was forced to engage in his whistle-blowing speech</b>	12:07	14	BY MR. GREIM:	12:10
15	<b>in the U.S.?</b>	12:07	15	<b>Q. Okay. I mean, the English translation</b>	12:10
16	MR. GRENDI: Objection.	12:07	16	<b>ends with an exclamation point. Right?</b>	12:10
17	THE WITNESS: I don't think so, because it	12:07	17	A. Right. Chinese also.	12:10
18	depends on, you know, how it's forced, forced by the	12:07	18	<b>Q. Chinese also, okay. So what is it in</b>	12:10
19	situation, forced by the individual. He didn't	12:07	19	<b>the English translation that you would change then?</b>	12:10
20	specify that.	12:07	20	<b>I want to make sure I understand precisely where you</b>	12:10
21	BY MR. GREIM:	12:07	21	<b>disagree with this translation.</b>	12:10
22	<b>Q. If you could go to -- let's go to the</b>	12:07	22	MR. GRENDI: Objection.	12:10
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1	THE WITNESS: Let's see I think it's the	12:10	1	<b>resources momentarily into best serving Chairman Xi</b>	12:13
2	tone. Yeah. It's not -- I mean, it's roughly	12:10	2	<b>Jinping's Chinese Dream", exclamation point.</b>	12:13
3	correct.	12:10	3	A. Yes.	12:13
4	BY MR. GREIM:	12:10	4	<b>Q. Is that fair?</b>	12:13
5	<b>Q. Okay.</b>	12:10	5	A. Yes.	12:13
6	A. That's my -- the tone seems to me more	12:10	6	<b>Q. And then under -- let's skip to "G".</b>	12:13
7	weighted on, you know, how he's going to devote	12:11	7	A. "G"?	12:13
8	everything.	12:11	8	<b>Q. Which might have to be the next page</b>	12:13
9	<b>Q. Do you have any doubt that Mr. Guo</b>	12:11	9	<b>now.</b>	12:13
10	<b>actually sent this letter?</b>	12:11	10	A. Yeah.	12:13
11	A. I have no idea if he did or not.	12:11	11	[Video presentation.]	12:13
12	<b>Q. Okay. Let me take you now to the final</b>	12:11	12	THE WITNESS: Yes.	12:13
13	<b>part of this paragraph 6, and that may go into the</b>	12:11	13	BY MR. GREIM:	12:14
14	<b>next page. Do we need to change yet?</b>	12:11	14	<b>Q. And the English translation is in bold</b>	12:14
15	A. No, not yet. Let me just see what you	12:11	15	<b>and italics. It says: "Assign me tasks to</b>	12:14
16	want.	12:11	16	<b>accomplish in furtherance of our national interests</b>	12:14
17	<b>Q. So you see six says: "A few small</b>	12:11	17	<b>initiative and engage in Chairman Xi Jinping's global</b>	12:14
18	<b>suggestions from the bottom of Wengui's heart."</b>	12:11	18	<b>strategy so that I can redeem myself by my good</b>	12:14
19	A. Yeah.	12:11	19	<b>service, demonstrating my patriotism and loyalty to</b>	12:14
20	<b>Q. Then he has actually, A, B, C, D, E, F,</b>	12:11	20	<b>Chairman Xi Jinping."</b>	12:14
21	<b>and G.</b>	12:11	21	<b>Did I read that correctly?</b>	12:14
22	A. Correct.	12:11	22	A. This is number -- it should be number	12:14
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1	<b>Q. And so if you look under "A", he says:</b>	12:11	1	what? Let's see.	12:14
2	<b>"Give Wengui an opportunity to chant for our nation."</b>	12:11	2	<b>Q. "G", 6(g).</b>	12:14
3	<b>And then the translator says that they have</b>	12:12	3	A. One, two, three, four, five, six, seven.	12:14
4	<b>added Communist China. Do you see?</b>	12:12	4	The last one?	12:14
5	A. Yeah.	12:12	5	<b>Q. Correct.</b>	12:14
6	<b>Q. That's not in the Chinese. Correct?</b>	12:12	6	A. Yeah. Yes.	12:14
7	A. No. That's not in Chinese.	12:12	7	<b>Q. Is that an accurate translation?</b>	12:15
8	<b>Q. Then he says: "In advocating our</b>	12:12	8	A. Not quite.	12:15
9	<b>nation's legal system solely for propagandizing</b>	12:12	9	<b>Q. What is off in the translation?</b>	12:15
10	<b>Chairman Xi Jinping's call for the Rule of Law in</b>	12:12	10	A. I think he says let's redeem myself,	12:15
11	<b>China", exclamation point.</b>	12:12	11	like let me correct my mistakes and perform, you	12:15
12	A. Right, but that's also -- this	12:12	12	know, like contribute. Yeah.	12:15
13	translation is bad. It's not accurate. Yeah. It	12:12	13	<b>Q. So other than -- so you would change</b>	12:15
14	is, you know, like advocating for nation's legal	12:12	14	<b>"redeem" to "correct my mistakes"?</b>	12:15
15	system beauty.	12:12	15	A. Yeah.	12:15
16	<b>Q. Okay. And does it --</b>	12:12	16	<b>Q. And will you have any change to good</b>	12:15
17	A. There's no for propaganda. You know,	12:12	17	<b>service, demonstrating my patriotism and loyalty to</b>	12:15
18	like a -- yeah. There is that propaganda. Sorry.	12:12	18	<b>Chairman Xi Jinping?</b>	12:15
19	Advocate, you can see advocate for Xi Jinping's Rule	12:12	19	A. That is -- it's not accurate	12:15
20	of Law in Chinese. It's a matter of translation.	12:12	20	translation, because I want to use the translation,	12:16
21	<b>Q. Okay. And then if you look at "B":</b>	12:13	21	direct translation, literal translation, use the	12:16
22	<b>"Can you consider to convert Wengui's influence and</b>	12:13	22	result to express my support of Xi and my patriots.	12:16
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1	<b>Q. Very well. Okay. Now, have you ever</b>	12:16	1	MR. GRENDI: Objection to form.	12:18
2	<b>heard Guo Wengui express similar sentiments?</b>	12:16	2	THE WITNESS: I don't specifically know that.	12:18
3	A. No.	12:16	3	BY MR. GREIM:	12:18
4	<b>Q. And when you helped to set up the</b>	12:16	4	<b>Q. Did he do it after this?</b>	12:18
5	<b>meeting between Strategic Vision and Guo Wengui, you</b>	12:16	5	MR. GRENDI: Objection.	12:18
6	<b>were not aware of this letter?</b>	12:16	6	MR. GAVENMAN: Objection.	12:18
7	A. No.	12:16	7	THE WITNESS: I think there's plenty he did	12:18
8	<b>Q. Do you know whether Guo Wengui received</b>	12:16	8	after that, but I just didn't follow whatever he	12:18
9	<b>the specific instructions he was asking for in this</b>	12:16	9	said.	12:18
10	<b>letter?</b>	12:16	10	BY MR. GREIM:	12:18
11	MR. GAVENMAN: Objection to form.	12:16	11	<b>Q. And your testimony is that you have no</b>	12:18
12	MR. GRENDI: Objection.	12:16	12	<b>knowledge of any other contacts -- well, let me</b>	12:18
13	THE WITNESS: No, but he explained what	12:16	13	<b>strike that.</b>	12:18
14	instructions he got from the video.	12:16	14	<b>You have no knowledge of any contacts that Guo</b>	12:18
15	BY MR. GREIM:	12:16	15	<b>or anyone working on his behalf had with the Chinese</b>	12:18
16	<b>Q. Oh. Do you believe in the video, he</b>	12:16	16	<b>Government after August of 2017?</b>	12:18
17	<b>actually explains the instructions he did receive?</b>	12:17	17	MR. GRENDI: Objection.	12:19
18	A. Yes. Yes. You have to give the	12:17	18	MR. GAVENMAN: Objection, form.	12:19
19	transcript of the entire thing so you would know what	12:17	19	THE WITNESS: August of 2017? No.	12:19
20	he's talking about.	12:17	20	BY MR. GREIM:	12:19
21	<b>Q. Well, is this based on what you have</b>	12:17	21	<b>Q. And do you know that he did not have</b>	12:19
22	<b>heard or what you see later in the transcript?</b>	12:17	22	<b>contacts with the Chinese Government after August of</b>	12:19
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1	A. I heard.	12:17	1	<b>2017?</b>	12:19
2	<b>Q. Okay. So --</b>	12:17	2	MR. GAVENMAN: Objection.	12:19
3	A. Just now.	12:17	3	MR. GRENDI: Objection.	12:19
4	<b>Q. I'm sorry. Tell us. What did he say?</b>	12:17	4	THE WITNESS: I don't have any knowledge	12:19
5	A. He said --	12:17	5	whether he has or have not.	12:19
6	MR. GRENDI: Objection. I just want to --	12:17	6	BY MR. GREIM:	12:19
7	hold on. I want to go the record. He didn't listen	12:17	7	<b>Q. Do you know whether it's true that Mr.</b>	12:19
8	to the whole video. So he's testifying as to what he	12:17	8	<b>Guo has been unable to move money from Hong Kong</b>	12:19
9	heard so far in the video.	12:17	9	<b>after he began speaking out as a dissident?</b>	12:19
10	MR. GREIM: I agree. I agree.	12:17	10	MR. GAVENMAN: Objection.	12:20
11	THE WITNESS: Yeah. Just the beginning part,	12:17	11	MR. GRENDI: Objection.	12:20
12	he specifically -- the interview -- the reporter	12:17	12	MR. GAVENMAN: Form and asked and answered,	12:20
13	asked him what instruction they give you. He	12:17	13	I'm fairly certain.	12:20
14	explained, basically, don't expose, you know, the	12:17	14	You can answer, but it's been asked before.	12:20
15	high-ranking government officials', you know,	12:17	15	THE WITNESS: Okay. I don't have that	12:20
16	corruption and don't use her Twitter, expose the	12:17	16	knowledge.	12:20
17	dirt.	12:18	17	BY MR. GREIM:	12:20
18	That's basically it. That's the instruction.	12:18	18	<b>Q. Have you advised Mr. Guo on any</b>	12:20
19	BY MR. GREIM:	12:18	19	<b>statements that he or his attorney has made in the</b>	12:20
20	<b>Q. And do you know when Guo Wengui last</b>	12:18	20	<b>press about this case?</b>	12:20
21	<b>exposed dirt on a high-ranking public officials?</b>	12:18	21	A. About this particular case, no.	12:20
22	MR. GAVENMAN: Objection.	12:18	22	MR. GRENDI: Objection.	12:20
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<p>1 THE WITNESS: And except at the very 12:20</p> <p>2 beginning, I advised him not to go forward with the 12:20</p> <p>3 lawsuit. 12:20</p> <p>4 BY MR. GREIM: 12:20</p> <p>5 <b>Q. Okay. Let's forge ahead. The very --</b> 12:20</p> <p>6 <b>did there come a time when you had a meeting just</b> 12:20</p> <p>7 <b>with French Wallop and Mike Waller --</b> 12:20</p> <p>8 A. Uh-huh. 12:20</p> <p>9 <b>Q. -- before Mr. Guo was present?</b> 12:20</p> <p>10 A. I don't have recollection. 12:21</p> <p>11 <b>Q. Okay. Do you recall --</b> 12:21</p> <p>12 A. We might. 12:21</p> <p>13 <b>Q. Okay. Well, do you recall having a</b> 12:21</p> <p>14 <b>meeting with them in order to determine whether you</b> 12:21</p> <p>15 <b>felt comfortable connecting Strategic Vision to Mr.</b> 12:21</p> <p>16 <b>Guo?</b> 12:21</p> <p>17 A. I don't recall that, but I always 12:21</p> <p>18 caution all the people I introduce to Miles and 12:21</p> <p>19 including Hudson, that Miles, some of what he exposed 12:21</p> <p>20 is verified. Some is not verified and comes from the 12:21</p> <p>21 Chinese, you know, communist system and you never 12:21</p> <p>22 know, you know, what to expect. 12:21</p> <p style="text-align: right;">Page 122</p>	<p>1 A. Yeah. 12:23</p> <p>2 <b>Q. -- I'm really referring to either French</b> 12:23</p> <p>3 <b>Wallop or Mike Waller. Okay?</b> 12:23</p> <p>4 A. Yes. 12:23</p> <p>5 <b>Q. So did you give them any other cautions</b> 12:23</p> <p>6 <b>about Mr. Guo?</b> 12:23</p> <p>7 A. I don't recall. I probably did say 12:23</p> <p>8 something, yeah, because as I said, I warned on both 12:23</p> <p>9 sides to be cautious as they move forward. 12:23</p> <p>10 <b>Q. Because in October or November of 2017,</b> 12:23</p> <p>11 <b>you had only known Mr. Guo for a few months.</b> 12:23</p> <p>12 <b>Correct?</b> 12:23</p> <p>13 A. Correct. 12:23</p> <p>14 <b>Q. And at that time, did you have some</b> 12:23</p> <p>15 <b>doubt about whether everything he had told you was</b> 12:23</p> <p>16 <b>true?</b> 12:23</p> <p>17 MR. GRENDI: Objection to form. 12:23</p> <p>18 MR. GAVENMAN: Objection. 12:23</p> <p>19 THE WITNESS: I do have some doubt, but I 12:23</p> <p>20 think what he's done, the whistle-blowing, is very 12:24</p> <p>21 significant, is very disruptive to Chinese Communist 12:24</p> <p>22 regime. So based on that, I was there to help. 12:24</p> <p style="text-align: right;">Page 124</p>
<p>1 I did caution them. At the same time, I also 12:21</p> <p>2 cautioned Miles. I have never deal with Mike French 12:22</p> <p>3 in a business transaction. So I didn't know if they 12:22</p> <p>4 are -- you know, they can do whatever they can do. 12:22</p> <p>5 So I warned both sides. 12:22</p> <p>6 <b>Q. And just so the testimony is clear, at</b> 12:22</p> <p>7 <b>the beginning of your answer, did you say that Mr.</b> 12:22</p> <p>8 <b>Guo came from the Chinese Communist system?</b> 12:22</p> <p>9 MR. GRENDI: Objection. 12:22</p> <p>10 MR. GAVENMAN: Objection. 12:22</p> <p>11 THE WITNESS: Come from -- everybody in China 12:22</p> <p>12 comes out of the rule, the system of the CCP. That's 12:22</p> <p>13 my meaning. 12:22</p> <p>14 BY MR. GREIM: 12:22</p> <p>15 <b>Q. Did you give Strategic Vision -- and by</b> 12:22</p> <p>16 <b>the way, when I say Strategic Vision --</b> 12:22</p> <p>17 A. I don't want to see your message. 12:22</p> <p>18 <b>Q. Oh, you're right. You get to see</b> 12:23</p> <p>19 <b>everything here.</b> 12:23</p> <p>20 <b>[Witness views computer screen.]</b> 12:23</p> <p>21 BY MR. GREIM: 12:23</p> <p>22 <b>Q. When I say Strategic Vision --</b> 12:23</p> <p style="text-align: right;">Page 123</p>	<p>1 BY MR. GREIM: 12:24</p> <p>2 <b>Q. And that was your state of mind at the</b> 12:24</p> <p>3 <b>time you introduced Mr. Guo to Strategic Vision?</b> 12:24</p> <p>4 A. Correct. 12:24</p> <p>5 <b>Q. Did you convey that -- did you convey</b> 12:24</p> <p>6 <b>those thoughts to Strategic Vision?</b> 12:24</p> <p>7 MR. GRENDI: Objection to form. 12:24</p> <p>8 MR. GAVENMAN: Objection. 12:24</p> <p>9 THE WITNESS: I think I did, because I said 12:24</p> <p>10 some of what he said is not verifiable. You cannot 12:24</p> <p>11 verify it at the time and some, indeed, has been 12:24</p> <p>12 verified like HNA. 12:24</p> <p>13 BY MR. 12:24</p> <p>14 <b>Q. Did they include his attendance at the</b> 12:24</p> <p>15 <b>Tieneman Square massacre?</b> 12:24</p> <p>16 MR. GRENDI: Objection. 12:24</p> <p>17 MR. GAVENMAN: Objection, form, privilege, 12:24</p> <p>18 we've established. He's not answering that question. 12:25</p> <p>19 THE WITNESS: I'm not answering that 12:25</p> <p>20 question, yeah. 12:25</p> <p>21 BY MR. GREIM: 12:25</p> <p>22 <b>Q. Did you advise Strategic Vision that it</b> 12:25</p> <p style="text-align: right;">Page 125</p>

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1	<b>should obtain a deposit from Mr. Guo?</b>	12:25	1	think he read it, because his English was not good at	12:27
2	MR. GRENDI: Objection.	12:25	2	the time.	12:27
3	THE WITNESS: I don't recall that. I might.	12:25	3	<b>Q. So you didn't translate it for him?</b>	12:27
4	I might have.	12:25	4	A. No.	12:27
5	BY MR. GREIM:	12:25	5	<b>Q. Do you recall what Strategic Vision's</b>	12:27
6	<b>Q. At that point, by, let's say, November</b>	12:25	6	<b>initial proposal was?</b>	12:28
7	<b>of 2017, were you aware of concerns with Mr. Guo not</b>	12:25	7	A. I didn't remember, but I think mostly	12:28
8	<b>paying everyone he had hired to do specific tasks?</b>	12:25	8	it's how to help him, media strategy, communication	12:28
9	MR. GRENDI: Objection.	12:25	9	strategy, that sort of thing.	12:28
10	MR. GAVENMAN: Objection.	12:25	10	<b>Q. Okay. Do you remember where that</b>	12:28
11	THE WITNESS: No.	12:25	11	<b>meeting was? I know your memory is not good of the</b>	12:28
12	BY MR. GREIM:	12:25	12	<b>very first meeting, but do you remember where you</b>	12:28
13	<b>Q. So other than your statement about Mr.</b>	12:25	13	<b>would have met French and Michael?</b>	12:28
14	<b>Guo, what did you -- what, if anything, did you tell</b>	12:26	14	A. I don't know where that meeting, the	12:28
15	<b>Strategic Vision about potential projects for Guo?</b>	12:26	15	first meeting, I met with them, whether it was before	12:28
16	A. Say that again.	12:26	16	we go to New York or, you know, we met in New York.	12:28
17	<b>Q. Let me just -- it was a confusing</b>	12:26	17	So but definitely, the first -- the meeting we had, I	12:28
18	<b>question.</b>	12:26	18	remember is in New York, the apartment of Miles Kwok.	12:28
19	<b>In your very first meeting with Strategic</b>	12:26	19	<b>Q. Was it around Thanksgiving?</b>	12:29
20	<b>Vision --</b>	12:26	20	A. It's November, yeah, during the time. I	12:29
21	A. Yeah.	12:26	21	don't know if it's, you know, Thanksgiving or close	12:29
22	<b>Q. -- what, if anything, did you tell</b>	12:26	22	to Thanksgiving.	12:29
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1	<b>Strategic Vision about projects that Guo needed done?</b>	12:26	1	MR. GREIM: All right. It is now about	12:29
2	A. I don't remember exactly the first	12:26	2	12:30. Why don't we -- I know we just took a break	12:29
3	meeting, what we discussed. I think the idea come to	12:26	3	about an hour ago. So why don't we take another	12:29
4	me to investigate through some conventional way, that	12:26	4	break for lunch. Let's make it like 45 minutes and	12:29
5	was later, probably later on, not the first meeting.	12:26	5	then we'll come back and just march through the	12:29
6	The first meeting was focused on how they can help	12:27	6	documents.	12:29
7	the communication, the P.R., but I don't remember	12:27	7	Does that make sense?	12:29
8	exactly when, you know.	12:27	8	MR. GAVENMAN: Sounds good.	12:29
9	<b>Q. Did Strategic Vision bring any documents</b>	12:27	9	MR. GREIM: Okay. Very good.	12:29
10	<b>to that first meeting?</b>	12:27	10	VIDEOGRAPHER: Going off the record. The	12:29
11	A. Yes. There is a proposal that I	12:27	11	time is now 12:31 p.m.	12:29
12	obtained pre -- before the meeting.	12:27	12	[Whereupon, at 12:31 p.m., a lunch recess was	12:29
13	<b>Q. Okay.</b>	12:27	13	taken, to reconvene at 1:15 p.m. this same day.]	12:29
14	A. To offer their services, specific	12:27	14		
15	services.	12:27	15		
16	<b>Q. Did you share that proposal with Mr.</b>	12:27	16		
17	<b>Guo?</b>	12:27	17		
18	A. I think I did.	12:27	18		
19	<b>Q. Did you share it with Mr. Gertz?</b>	12:27	19		
20	A. It had come from Gertz.	12:27	20		
21	<b>Q. Okay.</b>	12:27	21		
22	A. And I forwarded it to Miles. I don't	12:27	22		
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<p>1 AFTERNOON SESSION 12:29</p> <p>2 VIDEOGRAPHER: We are back on the record. 13:20</p> <p>3 The time is now 1:22 p.m. 13:20</p> <p>4 MR. GREIM: Let the record reflect the thumb 13:20</p> <p>5 drive from which I played two video clips that the 13:21</p> <p>6 witness viewed has been marked as Han Exhibit 7. 13:21</p> <p>7 We'll just keep this with the original exhibits, for 13:21</p> <p>8 now at least. 13:21</p> <p>9 [Han Exhibit No. 7 was 13:21</p> <p>10 marked for identification.] 13:21</p> <p>11 FURTHER EXAMINATION BY COUNSEL FOR 13:21</p> <p>12 DEFENDANT/COUNTERCLAIM PLAINTIFF 13:21</p> <p>13 BY MR. GREIM: 13:21</p> <p>14 <b>Q. Okay. So, Mr. Han, earlier, we talked 13:21</b></p> <p>15 <b>about a proposal that Strategic Vision had given to 13:21</b></p> <p>16 <b>Mr. Gertz, who then gave to you. Do you recall that? 13:21</b></p> <p>17 A. Yes. 13:21</p> <p>18 MR. GREIM: I'm going to show you what we are 13:21</p> <p>19 marking as Exhibit 8. 13:21</p> <p>20 [Han Exhibit No. 8 was 13:21</p> <p>21 marked for identification.] 13:21</p> <p>22 MR. GREIM: I'm going to ask you take a look 13:21</p> <p style="text-align: right;">Page 130</p>	<p>1 <b>not being forced to leave and lay out his long-term 13:23</b></p> <p>2 <b>objectives of guiding historic change in his 13:23</b></p> <p>3 <b>homeland. Did I read that right? 13:23</b></p> <p>4 A. Yes. 13:23</p> <p>5 <b>Q. And are those the objectives that, even 13:23</b></p> <p>6 <b>apart from the Strategic Vision work, you were trying 13:23</b></p> <p>7 <b>to advise Mr. Guo on? 13:23</b></p> <p>8 MR. GREIM: Objection. 13:23</p> <p>9 MR. GAVENMAN: Objection. 13:23</p> <p>10 THE WITNESS: Yes. 13:23</p> <p>11 BY MR. GREIM: 13:23</p> <p>12 <b>Q. Now, did you translate for Mr. Guo? 13:23</b></p> <p>13 A. I don't think so. I gave him a rough 13:24</p> <p>14 idea about what was proposed. 13:24</p> <p>15 <b>Q. And would you agree with me that most of 13:24</b></p> <p>16 <b>this document deals with, for lack of a better word, 13:24</b></p> <p>17 <b>public relations? 13:24</b></p> <p>18 A. Pretty much, yes. 13:24</p> <p>19 <b>Q. Or maybe, better, it would be public 13:24</b></p> <p>20 <b>communications? 13:24</b></p> <p>21 A. I think it's public image. Also, if you 13:24</p> <p>22 look at the layout, help him to accomplish his 13:24</p> <p style="text-align: right;">Page 132</p>
<p>1 at that and see if you recognize this document. It's 13:21</p> <p>2 Bates labeled SVU77 to 79, and the top of the page 13:21</p> <p>3 says "Vision". 13:22</p> <p>4 There's also handwriting in the upper 13:22</p> <p>5 right-hand corner that says "1st Mtg w/Guo". 13:22</p> <p>6 [Witness peruses exhibit.] 13:22</p> <p>7 MR. GREIM: Can you repeat what the question 13:22</p> <p>8 is? 13:22</p> <p>9 THE WITNESS: Did you ask me a question? 13:22</p> <p>10 BY MR. GREIM: 13:22</p> <p>11 <b>Q. All right. So, Mr. -- do you recognize 13:22</b></p> <p>12 <b>this document, Mr. Han? 13:22</b></p> <p>13 A. Yeah. It looks like the original. Yes. 13:23</p> <p>14 <b>Q. And I'll just ask you, if look at the 13:23</b></p> <p>15 <b>very first paragraph, it says: "This is a vision 13:23</b></p> <p>16 <b>from Mr. G." 13:23</b></p> <p>17 <b>Is that Mr. Guo? 13:23</b></p> <p>18 A. Yes. 13:23</p> <p>19 <b>Q. "To remain safely in this country and 13:23</b></p> <p>20 <b>accomplish his mission back home." 13:23</b></p> <p>21 <b>And then it presents a three-year roadmap to 13:23</b></p> <p>22 <b>enable him to accomplish his immediate objectives of 13:23</b></p> <p style="text-align: right;">Page 131</p>	<p>1 objectives here, and I would say my perception at the 13:24</p> <p>2 beginning is the P.R., you know, strategic P.R. 13:24</p> <p>3 <b>Q. What was Mr. Guo's reaction after you 13:24</b></p> <p>4 <b>summarized this? 13:24</b></p> <p>5 A. I don't remember specifically what he 13:24</p> <p>6 reacted to it, how he reacted to it. I have no 13:25</p> <p>7 recollection. 13:25</p> <p>8 <b>Q. Well, after you reviewed it, what was 13:25</b></p> <p>9 <b>your reaction to it? 13:25</b></p> <p>10 A. I think this is, you know, for me, he 13:25</p> <p>11 needs someone to steer him through this media world, 13:25</p> <p>12 focused world. I think he needs someone to help him. 13:25</p> <p>13 You know, that's just my understanding. I 13:25</p> <p>14 think this is perfect for him as well. 13:25</p> <p>15 <b>Q. At this point in time, did Mr. Guo have 13:25</b></p> <p>16 <b>Guo Media yet? 13:25</b></p> <p>17 A. No. 13:25</p> <p>18 MR. GREIM: Objection. 13:25</p> <p>19 MR. GAVENMAN: Objection. 13:25</p> <p>20 THE WITNESS: No. 13:25</p> <p>21 BY MR. GREIM: 13:25</p> <p>22 <b>Q. Have you heard of something called Guo 13:25</b></p> <p style="text-align: right;">Page 133</p>

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1	<b>Media?</b>	13:25	1	A. Yes.	13:29
2	A. No.	13:25	2	<b>Q. And then it mentions a Washington</b>	13:29
3	<b>Q. Oh. You've never heard of that?</b>	13:25	3	<b>residence to show purpose and power and provide</b>	13:29
4	A. I heard of Guo Media, yeah.	13:26	4	<b>hospitality?</b>	13:29
5	<b>Q. What is it?</b>	13:26	5	A. Yes.	13:29
6	A. That's his, Miles, his media platform, I	13:26	6	<b>Q. Now, do you recall being involved in</b>	13:29
7	think probably set up in 2018.	13:26	7	<b>discussions between Strategic Vision and Mr. Guo</b>	13:29
8	<b>Q. Would it surprise you to learn that Mr.</b>	13:26	8	<b>about Washington, a Washington residence?</b>	13:29
9	<b>Guo doesn't know who owns Guo Media?</b>	13:26	9	A. I think so. I remember that.	13:29
10	MR. GAVENMAN: Objection.	13:26	10	<b>Q. And do you recall, in fact, Mr. Guo</b>	13:29
11	MR. GRENDI: Objection.	13:26	11	<b>talking to Strategic Vision about real estate</b>	13:29
12	THE WITNESS: Nothing surprises me anymore.	13:26	12	<b>purchases both in Washington and in New York?</b>	13:29
13	MR. GREIM: All right. I'm now going to hand	13:26	13	MR. GRENDI: Objection.	13:29
14	you what's marked as Han Exhibit 9.	13:26	14	THE WITNESS: Yes. I think so.	13:29
15	[Han Exhibit No. 9 was	13:26	15	BY MR. GREIM:	13:29
16	marked for identification.]	13:26	16	<b>Q. For example, do you recall that they</b>	13:29
17	MR. GREIM: Sorry, guys. I'm just handing	13:26	17	<b>discussed even buying the former home of David</b>	13:29
18	them over across for your own internal distribution.	13:26	18	<b>Rockefeller in New York?</b>	13:29
19	MR. GRENDI: That's fine.	13:26	19	A. I didn't remember who initiated it, but	13:30
20	MR. GREIM: You'll see this is a four-page	13:26	20	I think there is such a discussion.	13:30
21	document Bates labeled SVUS000080 to 83, and it says	13:26	21	<b>Q. And were the discussions about real</b>	13:30
22	"Three-Year Timeline at the top. Please take a	13:27	22	<b>estate and offices mixed in with the discussions</b>	13:30
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1	second to review it, Mr. Han.	13:27	1	<b>about public campaign?</b>	13:30
2	[Witness peruses exhibit.]	13:27	2	MR. GAVENMAN: Objection, form.	13:30
3	THE WITNESS: Yeah.	13:28	3	MR. GRENDI: Objection.	13:30
4	BY MR. GREIM:	13:28	4	THE WITNESS: Yeah. It's hard for me to	13:30
5	<b>Q. Have you seen this document before?</b>	13:28	5	remember exactly. I think maybe they were separate	13:30
6	A. I might have. I have some recollection,	13:28	6	times or they were all together, yeah. Because it's	13:30
7	but it's not as clear as this one.	13:28	7	part of the package, it might have yeah, more likely.	13:30
8	<b>Q. Well, if you look at the strategic</b>	13:28	8	BY MR. GREIM:	13:30
9	<b>objectives in the very beginning, the five bullet</b>	13:28	9	<b>Q. Okay. So they were discussed at the</b>	13:30
10	<b>points, while there are five bullet points, do they</b>	13:28	10	<b>same time?</b>	13:30
11	<b>seem similar to the objectives identified in Exhibit</b>	13:28	11	MR. GRENDI: Objection.	13:30
12	<b>8?</b>	13:28	12	THE WITNESS: You know, sometimes when you	13:30
13	MR. GRENDI: Objection.	13:28	13	talk about real estate, I think they're purely	13:30
14	MR. GAVENMAN: Objection.	13:29	14	focused on real estate and not mentioned about some	13:30
15	THE WITNESS: Yeah.	13:29	15	other part. I mean, just sometimes, that might be	13:30
16	BY MR. GREIM:	13:29	16	mixed. So I don't recall specific events.	13:30
17	<b>Q. And you'll see down under "Personal</b>	13:29	17	BY MR. GREIM:	13:31
18	<b>Presence", it says: "Create a personal presence in</b>	13:29	18	<b>Q. It's hard to generalize?</b>	13:31
19	<b>Washington."</b>	13:29	19	A. Correct.	13:31
20	<b>And then it goes on. Do you see that?</b>	13:29	20	<b>Q. Okay. Now, if you notice, in these four</b>	13:31
21	A. Yes.	13:29	21	<b>pages, there's still no discussion of a research</b>	13:31
22	<b>Q. On the very first page?</b>	13:29	22	<b>project. Do you agree with me?</b>	13:31
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1	A. Correct.	13:31	1	A. No. It was purely my responsibility.	13:34
2	<b>Q. So let me ask you do you recall when in</b>	13:31	2	<b>Q. So do you know where -- well, let me</b>	13:34
3	<b>these discussions a research project actually began</b>	13:31	3	<b>back up.</b>	13:34
4	<b>to be discussed?</b>	13:31	4	<b>Do you understand that the initial research</b>	13:34
5	A. I didn't remember, but I know for a fact	13:31	5	<b>was to occur on a set of 15 names?</b>	13:34
6	I was the one who talked Miles into this. I	13:31	6	A. That was the nature, I think,	13:34
7	discussed with Mike and French to initiate this	13:31	7	originally. I don't know what names would be will.	13:34
8	research project.	13:31	8	<b>Q. It was more amorphous at the beginning?</b>	13:34
9	<b>Q. So I'm going to make sure I understand</b>	13:31	9	A. Correct.	13:34
10	<b>your testimony.</b>	13:31	10	MR. GRENDI: Objection.	13:34
11	A. Yes.	13:31	11	MR. GREIM: Well, let's see. I'm going to	13:34
12	<b>Q. You -- did the research -- was the</b>	13:31	12	now show you what we're going to mark as Exhibit 10.	13:34
13	<b>research project discussed between you and French and</b>	13:32	13	[Han Exhibit No. 10 was	13:34
14	<b>Mike before it was discussed with Mr. Guo?</b>	13:32	14	marked for identification.]	13:34
15	A. I didn't remember --	13:32	15	MR. GREIM: Wait a minute. This is a set of	13:35
16	MR. GAVENMAN: Form.	13:32	16	texts involving you, and I see -- let me make sure I	13:35
17	THE WITNESS: -- which comes first, but I	13:32	17	didn't --	13:35
18	come up with the idea, I believe to continue to	13:32	18	MR. GRENDI: You've got notes on one of them?	13:35
19	disrupt the Communist regime, we need sustainable	13:32	19	MR. GREIM: I thought I did. Maybe not.	13:35
20	fact-based, evidence-based exposure of Chinese	13:32	20	Maybe I don't.	13:35
21	corruption. So I thought, you know, this project	13:32	21	MR. GRENDI: Just for the record, this is the	13:35
22	could fill into that and I discussed with -- I don't	13:32	22	document you produced to me last night, you produced	13:35
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1	know who I discussed first, because I didn't know	13:32	1	to Eastern Profit last night?	13:35
2	there -- first, I think maybe I discussed with Mike	13:32	2	THE WITNESS: Correct. This is a -- these	13:35
3	and French whether they have the capability to do	13:32	3	are Bates numbered SVUS001842 to 1903 and they began	13:35
4	this, because in our conversation about these two	13:32	4	in November 12, 2017 and they go to July 15, 2018.	13:36
5	projects or, I mean, these two proposals, I	13:32	5	MR. GAVENMAN: Do you have a copy for me?	13:36
6	mentioned, I asked -- you know, they talked about	13:33	6	MR. GREIM: Unfortunately, I only have three	13:36
7	their accreditation for doing stuff for government,	13:33	7	copies. I was thinking there was something wrong	13:36
8	for contracts, for some other issues. I felt maybe I	13:33	8	here. So if you don't mind, if you guys can share.	13:36
9	asked them whether they have the capability to do	13:33	9	I'm sorry. I'm missing one copy of that set.	13:36
10	this type of research, and they gave me -- you know,	13:33	10	I hope that's not going to be the case for -- I've	13:36
11	they confirmed that they could have.	13:33	11	got other -- for some reason, we're missing one copy.	13:36
12	So I went back to Miles and said why don't we	13:33	12	I know what happened. I know what happened.	13:36
13	expand this proposal, do some research on those	13:33	13	[Discussion held off the record.]	13:37
14	corrupt officials; once we have solid evidence, we	13:33	14	MR. GREIM: This is the only one like this.	13:37
15	can expose them. So that's how it started.	13:33	15	So I'm sorry, everybody.	13:37
16	<b>Q. Now, when you made this proposal to Mr.</b>	13:33	16	BY MR. GREIM:	13:37
17	<b>Guo, did you have in mind yet which officials should</b>	13:33	17	<b>Q. Okay. So I will represent to you that</b>	13:37
18	<b>be targeted?</b>	13:33	18	<b>this is a compendium of your texts with French Wallop</b>	13:37
19	A. No, but I was -- mainly, I think we	13:33	19	<b>and you'll see that they begin on November 12th.</b>	13:37
20	understand the top officials.	13:33	20	A. Yes.	13:37
21	<b>Q. Okay. By the way, did Mr. Gertz play a</b>	13:34	21	<b>Q. My question for you, by the way, os did</b>	13:37
22	<b>role in coming up with the idea of research?</b>	13:34	22	<b>you first meet French at lunch at her home with Bill</b>	13:37
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1	<b>Gertz before Mr. Waller was there? Do you recall</b>	13:38	1	<b>Wallop there is asking that the lunch be pushed back</b>	13:39
2	<b>that?</b>	13:38	2	<b>to one?</b>	13:40
3	A. I don't.	13:38	3	A. Um-hum.	13:40
4	<b>Q. Okay. Well, you'll see that you are</b>	13:38	4	<b>Q. I'm sorry. I'm sorry. I take that</b>	13:40
5	<b>writing to her on -- in the morning of the 12th and</b>	13:38	5	<b>back. You see that you're asking that the lunch be</b>	13:40
6	<b>you say: "Hi, French. Great meeting you. I talked</b>	13:38	6	<b>pushed back because Bannon wants an urgent meeting at</b>	13:40
7	<b>with Miles and he's eager to meet you. He wants to</b>	13:38	7	<b>11:30?</b>	13:40
8	<b>invite you to Mar a Lago now, but I think it's better</b>	13:38	8	A. Yes.	13:40
9	<b>to wait until I come back from Japan."</b>	13:38	9	<b>Q. And by the way, was it common around</b>	13:40
10	<b>And then you're proposing a meeting on the</b>	13:38	10	<b>this time for Bannon to have, you know, meetings with</b>	13:40
11	<b>following week, on November the 19th. Do you see</b>	13:38	11	<b>Mr. Guo?</b>	13:40
12	<b>that?</b>	13:38	12	MR. GAVENMAN: Objection.	13:40
13	A. Right.	13:38	13	MR. GRENDI: Objection.	13:40
14	MR. GRENDI: Objection.	13:38	14	THE WITNESS: Say that again.	13:40
15	BY MR. GREIM:	13:38	15	BY MR. GREIM:	13:40
16	<b>Q. And you mention real estate. Correct?</b>	13:38	16	<b>Q. Was it common around this time for</b>	13:40
17	A. Um-hum.	13:38	17	<b>Bannon to have meetings with Mr. Guo?</b>	13:40
18	MR. GRENDI: Objection.	13:38	18	MR. GAVENMAN: Objection.	13:40
19	BY MR. GREIM:	13:38	19	MR. GRENDI: Objection.	13:40
20	<b>Q. And you say: "His priority is the</b>	13:38	20	THE WITNESS: Common? What do you mean,	13:40
21	<b>building opposite the Treasury."</b>	13:38	21	common?	13:40
22	A. Um-hum.	13:38	22	BY MR. GREIM:	13:40
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1	<b>Q. Okay. So by this point, do you believe</b>	13:38	1	<b>Q. Was it a --</b>	13:40
2	<b>you at least met French Wallop?</b>	13:38	2	A. Common practice?	13:40
3	A. Yeah. I might have.	13:38	3	<b>Q. Yeah. Did it happen on a regular basis?</b>	13:40
4	<b>Q. And you already talked to Mr. Guo about</b>	13:38	4	A. No, but Steve Bannon is very	13:40
5	<b>her?</b>	13:38	5	unpredictable. His schedule is always messed up.	13:40
6	A. Yes.	13:38	6	Always, we have to accommodate him. So that's	13:40
7	<b>Q. Let's forge ahead here. Then you see he</b>	13:38	7	common.	13:40
8	<b>she wrote you back, your report back about Japan.</b>	13:39	8	<b>Q. I see. If you go on now to page 45,</b>	13:40
9	<b>You say: "Steve Bannon stirred up things here. I am</b>	13:39	9	<b>you'll see that Ms. Wallop asked that you not</b>	13:40
10	<b>happy."</b>	13:39	10	<b>disclose their identities to Mr. Bannon.</b>	13:41
11	<b>Did I read that right?</b>	13:39	11	A. Correct.	13:41
12	A. Yes.	13:39	12	<b>Q. And you say, in fact, Mr. Guo does not</b>	13:41
13	<b>Q. Let's continue marching on, and if you</b>	13:39	13	<b>know her name yet.</b>	13:41
14	<b>look at around November 20th, do you see that you're</b>	13:39	14	A. Correct.	13:41
15	<b>setting --</b>	13:39	15	<b>Q. And does that sound right, that you did</b>	13:41
16	A. Where is the 20th?	13:39	16	<b>not disclose her name?</b>	13:41
17	<b>Q. Oh. It's SVUS001844.</b>	13:39	17	A. I didn't, yeah, because French asked me	13:41
18	A. 44?	13:39	18	not to mention their names at all. At the early	13:41
19	<b>Q. Um-hum. You got ahead of us a little</b>	13:39	19	stage, I didn't. Steve Bannon even didn't know they	13:41
20	<b>bit there.</b>	13:39	20	were going to be in that meeting at one o'clock.	13:41
21	A. Yes.	13:39	21	<b>Q. Okay. Very good. If you -- let's flip</b>	13:41
22	<b>Q. All right. So do you see that French</b>	13:39	22	<b>ahead now to 1852.</b>	13:41
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1	A. 52?	13:41	1	A. I think so, but -- yeah. I just don't	13:44
2	<b>Q. Um-hum. We're now into December 3rd.</b>	13:41	2	remember.	13:44
3	A. Yes.	13:41	3	<b>Q. By the way, do people drink alcohol when</b>	13:44
4	<b>Q. Do you see that you are being sent by</b>	13:41	4	<b>meals were served when they met?</b>	13:44
5	<b>Ms. Wallop, it looks like, a Hotel Washington</b>	13:42	5	A. Sometimes they do.	13:44
6	<b>property?</b>	13:42	6	MR. GAVENMAN: Objection, form.	13:44
7	A. Um-hum.	13:42	7	THE WITNESS: Sometimes they don't. Steve, I	13:44
8	<b>Q. Do you remember discussing that</b>	13:42	8	think Steve didn't want to drink.	13:44
9	<b>property?</b>	13:42	9	BY MR. GREIM:	13:44
10	A. No.	13:42	10	<b>Q. Forget about -- I'm sorry. I don't mean</b>	13:44
11	<b>Q. All right.</b>	13:42	11	<b>about Steve Bannon. I mean --</b>	13:45
12	A. There's just so many properties being	13:42	12	A. In general?	13:45
13	discussed.	13:42	13	<b>Q. -- when Strategic Vision met with Mr.</b>	13:45
14	<b>Q. Okay. Do you remember at this time -- I</b>	13:42	14	<b>Guo.</b>	13:45
15	<b>know there's not a lot of detail in these texts, but</b>	13:43	15	MR. GAVENMAN: Objection.	13:45
16	<b>do you remember whether the idea of a research</b>	13:43	16	THE WITNESS: I think I remember there was	13:45
17	<b>project had begun to be discussed by early December?</b>	13:43	17	served alcohol, wine.	13:45
18	A. I don't think so, not in this meeting.	13:43	18	BY MR. GREIM:	13:45
19	<b>Q. Okay.</b>	13:43	19	<b>Q. Okay. Did Mr. Guo have alcohol in these</b>	13:45
20	A. Because we just set up a preliminary	13:43	20	<b>meetings?</b>	13:45
21	meeting, first meeting.	13:43	21	MR. GAVENMAN: Objection.	13:45
22	<b>Q. Okay. And did it appear to you based on</b>	13:43	22	THE WITNESS: He had some.	13:45
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1	<b>the earlier text that maybe the very initial meeting,</b>	13:43	1	BY MR. GREIM:	13:45
2	<b>at least involving you and Strategic Vision, would</b>	13:43	2	<b>Q. What do you remember being discussed at</b>	13:45
3	<b>have been around Thanksgiving, in late November?</b>	13:43	3	<b>the very first meeting?</b>	13:45
4	A. Yeah. About that time, yeah. I just	13:43	4	A. Very little. I think it was more around	13:45
5	don't know exactly. I would say -- did I mention	13:43	5	like the projects here, the vision stuff.	13:45
6	here 17, that Bannon meeting? That's the date they	13:43	6	<b>Q. If you could skip to page 1854.</b>	13:45
7	first met, I think.	13:43	7	A. 54?	13:45
8	Remember here, where it says Bannon had a	13:43	8	<b>Q. Yeah. Actually, it's a few pages back</b>	13:45
9	meeting at 11:30, that pushed back to one o'clock?	13:43	9	<b>from where we were. I'm just trying to pin down</b>	13:45
10	<b>Q. Oh, right.</b>	13:44	10	<b>other dates of meetings.</b>	13:45
11	A. So that day should be their first	13:44	11	A. Okay.	13:45
12	meeting.	13:44	12	<b>Q. And it looks like there's going to be a</b>	13:45
13	<b>Q. I see. So does it look to you like that</b>	13:44	13	<b>meeting that day in New York City.</b>	13:46
14	<b>was November 20th?</b>	13:44	14	A. On December 9?	13:46
15	A. Yes. So that's the first meeting they	13:44	15	<b>Q. Correct.</b>	13:46
16	actually met in person.	13:44	16	A. Um-hum.	13:46
17	<b>Q. And you were there for that meeting?</b>	13:44	17	<b>Q. So do you believe -- this is clearly the</b>	13:46
18	A. Yes. I was there with Steve Bannon and	13:44	18	<b>second meeting, maybe the third meeting. Do you</b>	13:46
19	then with them.	13:44	19	<b>recall?</b>	13:46
20	<b>Q. Then after Bannon left, they came in?</b>	13:44	20	MR. GRENDI: Objection.	13:46
21	A. Yes.	13:44	21	THE WITNESS: That, I don't remember exactly.	13:46
22	<b>Q. Was a meal served?</b>	13:44	22	The first, this is definitely not the first, but I	13:46
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1	don't know if it's the second or third or fourth.	13:46	1	<b>Q. Okay. So you don't remember checking</b>	13:49
2	That, I'm not sure.	13:46	2	<b>names, checking other contacts that she provided to</b>	13:49
3	BY MR. GREIM:	13:46	3	<b>Mr. Guo?</b>	13:49
4	<b>Q. By the way, does Ms. Wallop tend to use</b>	13:46	4	A. No.	13:49
5	<b>emoticons in her text?</b>	13:46	5	<b>Q. You don't?</b>	13:49
6	A. Say that again.	13:46	6	A. No.	13:49
7	<b>Q. Does Ms. Wallop tend to use emoticons in</b>	13:46	7	<b>Q. Do you know if Mr. Guo, if he checked</b>	13:49
8	<b>her texts?</b>	13:46	8	<b>the names?</b>	13:49
9	A. Emoticons is like an emoji?	13:46	9	A. I have no idea.	13:49
10	<b>Q. Emojis, yes.</b>	13:46	10	<b>Q. But does this indicate to you that as of</b>	13:49
11	<b>Emoticons, is that even a word? I think I</b>	13:46	11	<b>mid-December, the parties are still very much in</b>	13:49
12	<b>meant emojis. I don't even know what an emoticon is.</b>	13:46	12	<b>discussions?</b>	13:49
13	A. Yeah.	13:46	13	A. Correct.	13:49
14	<b>Q. Okay. If you see -- now let's go ahead</b>	13:46	14	<b>Q. Okay.</b>	13:49
15	<b>now and turn to 1858.</b>	13:47	15	MR. GRENDI: For the record, just wait for	13:49
16	A. 58.	13:47	16	him to finish the question.	13:49
17	<b>Q. And December 16th, there's the long</b>	13:47	17	THE WITNESS: Okay.	13:49
18	<b>series of texts that runs from the 16th to the 17th.</b>	13:47	18	BY MR. GREIM:	13:50
19	<b>You're advising that you landed back from a trip and</b>	13:47	19	<b>Q. On the next page, in white, you respond</b>	13:50
20	<b>there's a -- do you see in green? Is that commentary</b>	13:47	20	<b>to this text from Ms. Wallop. She asked how your day</b>	13:50
21	<b>from Ms. Wallop?</b>	13:47	21	<b>went and you say "not good".</b>	13:50
22	A. Yeah.	13:47	22	A. Yes.	13:50
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1	<b>Q. Okay. Let's skip ahead. Do you see on</b>	13:47	1	<b>Q. What -- I don't understand. What is --</b>	13:50
2	<b>the next page -- this is now 1859 -- at the top, Ms.</b>	13:47	2	<b>what are you talking about in that text, if you can</b>	13:50
3	<b>Wallop says: "By the way, when your M asked for</b>	13:47	3	<b>recall?</b>	13:50
4	<b>names elsewhere, I gave him a mini list, not the real</b>	13:48	4	A. Yeah. I didn't know exactly what was --	13:50
5	<b>list."</b>	13:48	5	I think I had a fight with Steve Bannon, but I didn't	13:50
6	A. We're on 58?	13:48	6	know -- I didn't remember exactly what it was about.	13:50
7	<b>Q. I'm sorry. We're on 59 now. We moved,</b>	13:48	7	<b>Q. Okay. Let's continue on with the string</b>	13:50
8	<b>the same text.</b>	13:48	8	<b>here. You see now, moving into page 1861 from 1860,</b>	13:50
9	A. "By the way". Okay. Yeah.	13:48	9	<b>we are now under the heading December 18, 2017 and</b>	13:51
10	[Witness peruses exhibit.]	13:48	10	<b>Ms. Wallop says: "Safe journey back, please."</b>	13:51
11	BY MR. GREIM:	13:48	11	<b>And you respond: "Great meeting with our</b>	13:51
12	<b>Q. Do you know whether you or Mr. Guo ever</b>	13:48	12	<b>friend. He is coming in two weeks to Washington."</b>	13:51
13	<b>followed up to check with any of these contacts?</b>	13:48	13	<b>Do you see that?</b>	13:51
14	MR. GAVENMAN: Objection, form.	13:48	14	A. Yes.	13:51
15	THE WITNESS: I have no idea.	13:48	15	<b>Q. Do you know who you were referring to</b>	13:51
16	[Interruption.]	13:48	16	<b>there?</b>	13:51
17	BY MR. GREIM:	13:48	17	A. I think it's, perhaps, Miles. I'm just	13:51
18	<b>Q. My question was -- well, first of all,</b>	13:49	18	speculating. Maybe he came to Washington to look at	13:51
19	<b>let's back up.</b>	13:49	19	houses.	13:51
20	<b>Do you remember getting a list of references</b>	13:49	20	<b>Q. Okay. Did he come to Washington at some</b>	13:51
21	<b>from French Wallop?</b>	13:49	21	<b>point to look at houses?</b>	13:51
22	A. No.	13:49	22	A. I think he did, yes. At least I	13:51
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<p>1 remember once. 13:51</p> <p>2 <b>Q. Okay. It looks like on the 19th, the</b> 13:51</p> <p>3 <b>discussion continues here. She says: "Just checked</b> 13:52</p> <p>4 <b>with M and after three is fine for him as well."</b> 13:52</p> <p>5 <b>On the 20th, she checks again. Do you recall</b> 13:52</p> <p>6 <b>having another meeting, setting up another meeting</b> 13:52</p> <p>7 <b>with Mr. Guo and Wallop and Waller? If you need to</b> 13:52</p> <p>8 <b>page forward or backward in this to help yourself,</b> 13:52</p> <p>9 <b>please do.</b> 13:52</p> <p>10 A. Page 4? Oh. I think that trip, most 13:52</p> <p>11 likely, was looking for real estate in Washington. 13:52</p> <p>12 <b>Q. Let's move to December 21.</b> 13:53</p> <p>13 A. 21, okay. 13:53</p> <p>14 <b>Q. There, you say: "Our friend from Tokyo</b> 13:53</p> <p>15 <b>wants to know when is earliest he can come to meet."</b> 13:53</p> <p>16 A. Wants to know when is the earliest that 13:53</p> <p>17 he can come to meet. 13:53</p> <p>18 <b>Q. Is this referring to Mr. Guo or a</b> 13:53</p> <p>19 <b>different person?</b> 13:53</p> <p>20 A. It's a different person. 13:53</p> <p>21 <b>Q. So were you working with Strategic</b> 13:53</p> <p>22 <b>Vision on a different potential client?</b> 13:53</p> <p style="text-align: right;">Page 154</p>	<p>1 A. Yes. 13:54</p> <p>2 <b>Q. French Wallop says: "Hi there. Were</b> 13:54</p> <p>3 <b>you able to set a time to visit New York? I know you</b> 13:54</p> <p>4 <b>will let us know as the conversation unfolds."</b> 13:54</p> <p>5 <b>And then if you continue to page 1864, there's</b> 13:54</p> <p>6 <b>your response. You say: "Not yet. He is</b> 13:54</p> <p>7 <b>incommunicado."</b> 13:54</p> <p>8 <b>Then you say: "Our Japan friend arrives on</b> 13:54</p> <p>9 <b>the 2nd."</b> 13:54</p> <p>10 <b>Do you see that?</b> 13:55</p> <p>11 A. Yes. 13:55</p> <p>12 <b>Q. So was there a time in mid-December when</b> 13:55</p> <p>13 <b>Mr. Guo sort of stopped conferring with you about</b> 13:55</p> <p>14 <b>this matter?</b> 13:55</p> <p>15 MR. GAVENMAN: Objection, form. 13:55</p> <p>16 MR. GRENDI: Objection. 13:55</p> <p>17 THE WITNESS: I don't think specifically on 13:55</p> <p>18 this matter. Just he's not reachable at the time. 13:55</p> <p>19 BY MR. GREIM: 13:55</p> <p>20 <b>Q. Okay. If you go down to December 24th,</b> 13:55</p> <p>21 <b>you have another followup to Ms. Wallop. You say:</b> 13:55</p> <p>22 <b>"I talked with him and he says he wants to do it, but</b> 13:55</p> <p style="text-align: right;">Page 156</p>
<p>1 A. Yes. 13:53</p> <p>2 <b>Q. And might that have been the person that</b> 13:53</p> <p>3 <b>you're referring to back on the previous page, 1862?</b> 13:53</p> <p>4 A. 1862? 13:53</p> <p>5 MR. GRENDI: Objection. 13:53</p> <p>6 MR. GAVENMAN: Objection. 13:53</p> <p>7 BY MR. GREIM: 13:53</p> <p>8 <b>Q. I'm sorry. 1861.</b> 13:53</p> <p>9 A. Oh, yeah. It could be that person. So 13:53</p> <p>10 yeah. 13:53</p> <p>11 <b>Q. It could have been the Tokyo person?</b> 13:54</p> <p>12 A. It could have been the Tokyo person, not 13:54</p> <p>13 Miles. It's just very confusing. Yeah. 13:54</p> <p>14 <b>Q. So throughout this string, are you kind</b> 13:54</p> <p>15 <b>of talking about both matters at once?</b> 13:54</p> <p>16 A. Yes. 13:54</p> <p>17 <b>Q. The Guo and the Tokyo matter?</b> 13:54</p> <p>18 A. Yes. They are all mixed. 13:54</p> <p>19 <b>Q. Let's keep going now.</b> 13:54</p> <p>20 A. Yeah. 13:54</p> <p>21 <b>Q. If you could go to the bottom of 1863,</b> 13:54</p> <p>22 <b>December 22, 2017.</b> 13:54</p> <p style="text-align: right;">Page 155</p>	<p>1 <b>would like to put a clause in the contract which says</b> 13:55</p> <p>2 <b>if you failed to provide the deliverables as defined</b> 13:55</p> <p>3 <b>in the scope, you should return the deposit. What do</b> 13:55</p> <p>4 <b>you think?"</b> 13:55</p> <p>5 <b>Do you see that?</b> 13:55</p> <p>6 A. Yes. 13:55</p> <p>7 <b>Q. Now, were you conveying a message from</b> 13:55</p> <p>8 <b>Mr. Guo there?</b> 13:55</p> <p>9 A. Yes. 13:55</p> <p>10 <b>Q. And so by December 24th, were</b> 13:55</p> <p>11 <b>discussions far enough along that you had already</b> 13:55</p> <p>12 <b>begun discussing the actual research project at</b> 13:55</p> <p>13 <b>issue?</b> 13:55</p> <p>14 A. Correct. 13:55</p> <p>15 <b>Q. Okay. Then if you go on, you can see</b> 13:56</p> <p>16 <b>Ms. Wallop's response actually consumes the rest of</b> 13:56</p> <p>17 <b>1864 through 1866. If you could, could you take a</b> 13:56</p> <p>18 <b>second to review that, sir.</b> 13:56</p> <p>19 A. Um-hum. 13:56</p> <p>20 [Witness peruses exhibit.] 13:56</p> <p>21 THE WITNESS: Yeah. 13:56</p> <p>22 BY MR. GREIM: 13:57</p> <p style="text-align: right;">Page 157</p>

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1	<b>Q. Okay. Do you recall this conversation?</b>	13:57	1	my understanding is he doesn't want me to sign it.	13:59
2	A. Yes. Now, I remember, yes.	13:57	2	<b>Q. Guo does not want you to sign it?</b>	13:59
3	<b>Q. And you recall that Ms. Wallop did not</b>	13:57	3	A. No. He does not.	13:59
4	<b>want to agree to return of the deposit. Correct?</b>	13:57	4	<b>Q. Let me back up for a second here before</b>	13:59
5	A. Um-hum.	13:57	5	<b>we go further.</b>	13:59
6	<b>Q. You also see she references that you,</b>	13:57	6	A. Yeah.	13:59
7	<b>yourself, would be on the hook, because as of this</b>	13:57	7	<b>Q. We can stop looking at those texts for a</b>	13:59
8	<b>time, she understood that you were going to sign the</b>	13:57	8	<b>second.</b>	13:59
9	<b>contract. Do you see that part?</b>	13:57	9	A. That's okay.	13:59
10	MR. GRENDI: Objection.	13:57	10	<b>Q. What was your role here? Did you see</b>	13:59
11	THE WITNESS: "We will have entered -- which	13:57	11	<b>yourself as an intermediary between the two sides or</b>	13:59
12	part?	13:58	12	<b>as a representative of Guo?</b>	13:59
13	BY MR. GREIM:	13:58	13	A. I think I'm a person to facilitate this	13:59
14	<b>Q. Really, it's sort of at the bottom of</b>	13:58	14	project. I am friend on both sides. I have no	14:00
15	<b>1865 into 1866. Do you see it says -- at the very</b>	13:58	15	financial interest in there.	14:00
16	<b>bottom of 65, it says: "Since he wants you to sign."</b>	13:58	16	My entire thing is driven by the political	14:00
17	A. Yeah.	13:58	17	agenda. So I just want to get the things done, you	14:00
18	<b>Q. "And, therefore, be responsible for</b>	13:58	18	know, achieve what we said we're going to do. That's	14:00
19	<b>payments, that is also very complex and unfair to</b>	13:58	19	it.	14:00
20	<b>you."</b>	13:58	20	<b>Q. By the way, during this period, did Guo</b>	14:00
21	A. Right. What's the question?	13:58	21	<b>approach you and ask you to work for him full time?</b>	14:00
22	<b>Q. Well, do you recall that at some point,</b>	13:58	22	MR. GAVENMAN: Objection to form.	14:00
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1	<b>you were going to be the person to sign the</b>	13:58	1	THE WITNESS: He did. I don't know when.	14:00
2	<b>agreement?</b>	13:58	2	BY MR. GREIM:	14:00
3	A. It wasn't that clear at the time who's	13:58	3	<b>Q. And what was your response?</b>	14:00
4	going to sign, because, obviously, I didn't want to	13:58	4	A. I thought I said I have to think about	14:00
5	get in the middle. That was my intention from the	13:58	5	it, but it's probably, I think way before this,	14:00
6	very beginning.	13:58	6	before the project.	14:00
7	<b>Q. Well, where did the idea of you signing</b>	13:58	7	<b>Q. You don't recall telling Mr. Waller or</b>	14:00
8	<b>come from? Was it suggested by someone?</b>	13:58	8	<b>Ms. Wallop right around the time of the project that</b>	14:01
9	A. I think French wants me to sign that as	13:58	9	<b>Mr. Guo had made the suggestion to you and you were</b>	14:01
10	go-between so I can communicate better with them and	13:58	10	<b>considering it?</b>	14:01
11	with Miles. That's my recollection.	13:59	11	A. I think --	14:01
12	<b>Q. Okay. Now, why wouldn't Guo just sign</b>	13:59	12	MR. GAVENMAN: Objection to form.	14:01
13	<b>it himself?</b>	13:59	13	THE WITNESS: I didn't remember if I	14:01
14	A. That, I don't know.	13:59	14	mentioned it. I probably did, but I didn't recall	14:01
15	<b>Q. Did Guo not want to sign it himself?</b>	13:59	15	the time and the contents -- the context.	14:01
16	MR. GAVENMAN: Objection.	13:59	16	BY MR. GREIM:	14:01
17	MR. GRENDI: Objection.	13:59	17	<b>Q. Did there come a time when you</b>	14:01
18	THE WITNESS: I have no idea.	13:59	18	<b>ultimately told Mr. Guo that you wouldn't do it?</b>	14:01
19	BY MR. GREIM:	13:59	19	MR. GAVENMAN: Objection to form.	14:01
20	<b>Q. Well, did you discuss it with him?</b>	13:59	20	THE WITNESS: I never made a specific -- we	14:01
21	A. No. We hadn't got -- you know, who is	13:59	21	just leave it at that.	14:01
22	going to sign, I think we have not got that far, but	13:59	22	BY MR. GREIM:	14:01
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1	<b>Q. Well, after this time, did he ever come</b>	14:01	1	officials, Wang Qishan, nephew -- not nephew --	14:03
2	<b>back to you again and say he would like you to work</b>	14:01	2	niece's E-mail account or bank account -- I forgot --	14:04
3	<b>for him exclusively?</b>	14:01	3	something to that effect. Yeah.	14:04
4	A. What do you mean, after this?	14:01	4	<b>Q. And did they represent to you that they</b>	14:04
5	<b>Q. Well, let's say after December of 2017.</b>	14:01	5	<b>had done anything illegal?</b>	14:04
6	A. 2017? I think we haven't discussed	14:01	6	A. Well, first of all, I cannot verify that	14:04
7	since. I didn't see anything at all. I didn't	14:02	7	is the real bank account or information. I just saw	14:04
8	respond, confirm or deny or reject. He never	14:02	8	the screen shot and there's a -- you know, it showed	14:04
9	mentioned it again.	14:02	9	the person's name and stuff, and so I didn't, you	14:04
10	<b>Q. Do you remember a moment when Ms. Wallop</b>	14:02	10	know, register anything of that thought.	14:04
11	<b>called you to come over to her apartment --</b>	14:02	11	<b>Q. Sure. And my question is not what you</b>	14:04
12	A. Yes.	14:02	12	<b>think determined. It's did they represent to you</b>	14:04
13	<b>Q. -- late at night and look at something?</b>	14:02	13	<b>that they had done anything illegal in pulling up the</b>	14:04
14	MR. GAVENMAN: Objection to form.	14:02	14	<b>information?</b>	14:04
15	THE WITNESS: There is some time, I think she	14:02	15	A. I didn't know, because we discussed	14:04
16	called me to come to her house.	14:02	16	about how to do it legally, and I think this was	14:05
17	BY MR. GREIM:	14:02	17	during the project formation of what we needed to be	14:05
18	<b>Q. And what was the purpose of that visit?</b>	14:02	18	done, how to not violate law in this country and go	14:05
19	MR. GAVENMAN: Objection to form.	14:02	19	outside of the country and do stuff that the other	14:05
20	THE WITNESS: I think -- I don't specifically	14:02	20	country might be legally obtained, this information.	14:05
21	remember. It probably has to do with the project.	14:02	21	<b>Q. What impact did that have on you when</b>	14:05
22	BY MR. GREIM:	14:02	22	<b>you saw what they pulled up on the screen?</b>	14:05
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1	<b>Q. Did it have to do with something that</b>	14:02	1	A. I first thought they have the ability,	14:05
2	<b>she said she could find, some research that she could</b>	14:02	2	the capacity, to dig into the information Miles is	14:05
3	<b>find?</b>	14:02	3	looking for, I was looking for, and if it's, you	14:05
4	A. Research she could find?	14:02	4	know, really real. So that was my first impression.	14:05
5	MR. GRENDI: Objection.	14:02	5	So I told Miles they have the capability to	14:06
6	THE WITNESS: We had so many meetings in her	14:02	6	get the information they needed. I mean we needed.	14:06
7	house. So I don't, you know, specifically recall.	14:03	7	Yeah.	14:06
8	You know, mostly, it relate to the research projects.	14:03	8	<b>Q. Now, do you have any reason to think</b>	14:06
9	BY MR. GREIM:	14:03	9	<b>that what they showed you wasn't real?</b>	14:06
10	<b>Q. Okay. Do you recall her asking you to</b>	14:03	10	A. I don't, because it's hard -- with just	14:06
11	<b>come over so she can show you that she was able to</b>	14:03	11	the one screen shot, it's very hard to say this is	14:06
12	<b>get into a certain bank account on her computer?</b>	14:03	12	the real thing.	14:06
13	A. Yes.	14:03	13	<b>Q. Do you remember anything else they told</b>	14:06
14	MR. GAVENMAN: Objection.	14:03	14	<b>you about the screen shot?</b>	14:06
15	BY MR. GREIM:	14:03	15	A. Yeah. They told me they have a team	14:06
16	<b>Q. All right. And did you come over and</b>	14:03	16	that got into the system and the system, you know, we	14:06
17	<b>view it?</b>	14:03	17	have to be very careful with the team outside of this	14:06
18	A. Yes.	14:03	18	country, and they want to be very careful and track	14:06
19	<b>Q. What did you see?</b>	14:03	19	information, because they can have some trigger	14:06
20	A. I saw -- I think Mike showed me that,	14:03	20	mechanisms, a switch that can turn it off, and then	14:06
21	not French, and, actually, it's a screen shot that	14:03	21	we should monitor the accounts rather than extract	14:07
22	shows one of the Chinese Government high-ranking	14:03	22	the information. I think that's the only thing I	14:07
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1	remember.	14:07	1	<b>their own employees?</b>	14:09
2	<b>Q. Did they actually mention that to you</b>	14:07	2	MR. GAVENMAN: Objection.	14:09
3	<b>repeatedly, that it was important to monitor rather</b>	14:07	3	THE WITNESS: I think they didn't	14:09
4	<b>than, simply, breaking into the accounts?</b>	14:07	4	specifically say that's their employees. They just	14:09
5	MR. GRENDI: Objection. You can answer.	14:07	5	hire contract people to do the work. I think that's	14:09
6	THE WITNESS: Yes.	14:07	6	my recollection.	14:09
7	MR. GRENDI: Sorry.	14:07	7	BY MR. GREIM:	14:09
8	THE WITNESS: Yeah. The emphasis was on that	14:07	8	<b>Q. Let's talk now about the 15 names. We</b>	14:09
9	point.	14:07	9	<b>touched on this just a little bit earlier.</b>	14:09
10	BY MR. GREIM:	14:07	10	A. Yeah.	14:09
11	<b>Q. And was that your understanding of what</b>	14:07	11	<b>Q. Do you remember sitting with Mr. Guo --</b>	14:09
12	<b>they were supposed to be doing under the contract?</b>	14:07	12	A. Yeah.	14:10
13	MR. GAVENMAN: Objection.	14:07	13	<b>Q. -- and Ms. Wallop and Mr. Waller and</b>	14:10
14	MR. GRENDI: Objection.	14:07	14	<b>walking through a packet of the 15 names?</b>	14:10
15	THE WITNESS: Under the contract, I think	14:07	15	MR. GAVENMAN: Objection.	14:10
16	there's specifically -- it says specific information	14:07	16	THE WITNESS: I think, yeah. I think -- I	14:10
17	that, you know, they were looking for and they were	14:07	17	don't know if I were there or Yvette, because at the	14:10
18	supposed to deliver, and I think whether always	14:07	18	very beginning, maybe I was there. We talked about a	14:10
19	monitor or not always monitor and extract at one	14:08	19	fish tank of things, and the names, maybe I learned	14:10
20	time, there's no such specification, you know,	14:08	20	later, because at one point, he didn't want me to get	14:10
21	specific provision in there.	14:08	21	involved.	14:10
22	BY MR. GREIM:	14:08	22	So I didn't know the names at the time.	14:10
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1	<b>Q. So, however, your understanding is not</b>	14:08	1	Basically, I'm saying I'm a little confused about	14:10
2	<b>that the contract required them to break into the</b>	14:08	2	whether I was present when the 15 names presented,	14:10
3	<b>accounts. Correct?</b>	14:08	3	but I learned later on. At least I know who they	14:10
4	MR. GRENDI: Objection.	14:08	4	are.	14:10
5	MR. GAVENMAN: Objection.	14:08	5	BY MR. GREIM:	14:10
6	THE WITNESS: Please rephrase.	14:08	6	<b>Q. All right. By the way, when did -- when</b>	14:10
7	BY MR. GREIM:	14:08	7	<b>exactly did Yvette Wang get involved here?</b>	14:11
8	<b>Q. Sure. Your understanding is not that</b>	14:08	8	A. So when they reached -- when we	14:11
9	<b>the contract required them to break into these</b>	14:08	9	basically negotiated on the project, the contract was	14:11
10	<b>accounts, is it?</b>	14:08	10	pretty done, like how much he's going to pay, who --	14:11
11	MR. GRENDI: Objection.	14:08	11	what the chunk, tranche of information they're going	14:11
12	MR. GAVENMAN: Objection.	14:08	12	to provide, and then we solved the deposit issue.	14:11
13	THE WITNESS: Not necessarily, but the	14:08	13	How we solved it, I didn't remember, and at the time,	14:11
14	discussion, during the discussion, the deliverables	14:08	14	the basic foundation is done. So he said, I don't	14:11
15	made it very clear that three types of -- three or	14:08	15	want you to get involved; so you're out.	14:11
16	four types information that the contract is going to	14:08	16	I didn't know what was going on afterwards,	14:11
17	require. That is including the detailed information	14:08	17	how the contract restructured, because there were	14:11
18	of financial statements, bank account, credit cards,	14:09	18	changes afterward. So I have no idea.	14:11
19	all of that.	14:09	19	<b>Q. Do you recall that Mr. Guo walked away</b>	14:11
20	BY MR. GREIM:	14:09	20	<b>from the project, abandoned it, and a company called</b>	14:12
21	<b>Q. Okay. Did French and Mike tell you that</b>	14:09	21	<b>Eastern Profit came in to take his place?</b>	14:12
22	<b>all of the people working on the project would be</b>	14:09	22	MR. GAVENMAN: Objection.	14:12
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1	MR. GRENDI: Objection.	14:12	1	MR. GAVENMAN: Okay.	14:14
2	THE WITNESS: I didn't know it.	14:12	2	BY MR. GREIM:	14:14
3	BY MR. GREIM:	14:12	3	<b>Q. All right. So tell me what do you</b>	14:14
4	<b>Q. Do you believe that happened?</b>	14:12	4	<b>recall about this document?</b>	14:14
5	MR. GAVENMAN: Objection.	14:12	5	A. I remember this is -- I don't remember I	14:14
6	MR. GRENDI: Objection.	14:12	6	saw this in my Miles' place. Probably I saw it	14:14
7	THE WITNESS: I didn't remember or recall how	14:12	7	through French, at French's house, but I'm not, you	14:14
8	he walked out. At some point, he asked me, you know,	14:12	8	know, a hundred percent sure.	14:14
9	you need to step in to manage the project.	14:12	9	<b>Q. Do you remember that this is a document</b>	14:14
10	BY MR. GREIM:	14:12	10	<b>that Mr. Guo showed to Mr. Wallop and -- Mr. Waller</b>	14:15
11	<b>Q. So you were gone and then you were back?</b>	14:12	11	<b>and Ms. Wallop?</b>	14:15
12	A. Yes.	14:12	12	A. Most likely.	14:15
13	[Wang Exhibit No. 12 was	14:12	13	MR. GRENDI: Objection.	14:15
14	identified for the record.]	14:12	14	MR. GAVENMAN: Objection.	14:15
15	BY MR. GREIM:	14:12	15	BY MR. GREIM:	14:15
16	<b>Q. Okay. Let's go to the names. I'm going</b>	14:12	16	<b>Q. And did you know that -- well, do you</b>	14:15
17	<b>to show what we've marked in another deposition as</b>	14:12	17	<b>know where these names came from?</b>	14:15
18	<b>Exhibit 12, and you'll see that this is Wang Exhibit</b>	14:12	18	MR. GAVENMAN: Objection.	14:15
19	<b>12. It starts at SVUS000171 and goes to 258, and if</b>	14:13	19	THE WITNESS: I don't know where it comes	14:15
20	<b>you thumb through, you'll see it follows the same</b>	14:13	20	from, but I know this is probably what Miles wanted	14:15
21	<b>format always. There is a number with someone's</b>	14:13	21	them to look into.	14:15
22	<b>name, and then behind it is some information about</b>	14:13	22	BY MR. GREIM:	14:15
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1	<b>that person, and it goes on for several pages, and</b>	14:13	1	<b>Q. Did you discuss with Mr. Guo which names</b>	14:15
2	<b>then there is a second name and so on.</b>	14:13	2	<b>would be good for the project?</b>	14:15
3	<b>Take a second, if you could, just to study</b>	14:13	3	A. No, not at all. This is entirely his.	14:15
4	<b>this and then I'll ask you a few questions about it.</b>	14:13	4	<b>Q. Do you know who did?</b>	14:15
5	A. Yeah. I'm familiar with this.	14:13	5	A. I have no idea.	14:15
6	<b>Q. Okay.</b>	14:13	6	<b>Q. Do you remember a meeting in Guo's</b>	14:15
7	MR. GRENDI: On the record, has Mr. Han	14:13	7	<b>apartment where he had this stack of names and sort</b>	14:15
8	signed the addendum to the protective order?	14:13	8	<b>of tossed it out on the table to Ms. Wallop and Mr.</b>	14:15
9	MR. GREIM: Oh, no. He hasn't. Okay. Let's	14:13	9	<b>Waller and said this cost him \$250 million?</b>	14:15
10	cover this. So we have a protective order in this	14:13	10	MR. GRENDI: Objection.	14:15
11	case, confidential order, and many of the documents	14:13	11	MR. GAVENMAN: Objection.	14:15
12	that we have here today are marked as confidential,	14:14	12	THE WITNESS: I don't remember that. I think	14:15
13	at least as of right now.	14:14	13	the \$2 million, you know, that phrase, that, I	14:15
14	THE WITNESS: Yeah.	14:14	14	remember vaguely, yeah.	14:16
15	MR. GREIM: So we'll ask you, and I'll work	14:14	15	BY MR. GREIM:	14:16
16	with your attorney on this, to sign an order agreeing	14:14	16	<b>Q. Okay. Let me -- that was a compound</b>	14:16
17	to be bound by the protective order in this case,	14:14	17	<b>question too. So let me ask you do you remember Mr.</b>	14:16
18	which means that you can take things here and, you	14:14	18	<b>Guo claiming that this research had cost him, let's</b>	14:16
19	know, show them around, talk them outside. Now, not	14:14	19	<b>say, over \$200 million just to compile this?</b>	14:16
20	all of this is going to end up remaining	14:14	20	A. \$200 million? I don't remember \$200	14:16
21	confidential, but until we've worked it out with the	14:14	21	million. He exaggerates somewhat, like some certain	14:16
22	judge, that's sort of our status quo.	14:14	22	amount for this research.	14:16
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1	<b>Q. Do you remember telling Ms. Wallop and</b>	14:16	1	A. Wang Qishan, W-A-N-G, Q-I-S-H-A-N.	14:18
2	<b>Mr. Waller that the \$200 hundred was probably an</b>	14:16	2	<b>Q. This is the same person that Bannon had</b>	14:18
3	<b>exaggeration?</b>	14:16	3	<b>met with. Right?</b>	14:18
4	A. I probably did.	14:16	4	A. Yes, and Mu Jen Ju is another person	14:18
5	<b>Q. So did there come a time when you did</b>	14:16	5	that is a Chinese security chief. He's also in here.	14:19
6	<b>study the names and information in this packet?</b>	14:16	6	He persecuted Miles' family.	14:19
7	A. Yeah.	14:16	7	<b>Q. Now, do you know whether Mr. Guo ended</b>	14:19
8	<b>Q. When was that?</b>	14:16	8	<b>up getting research on these individuals from some</b>	14:19
9	A. I don't recall the exact date.	14:16	9	<b>other source other than Strategic Vision?</b>	14:19
10	<b>Q. Do you remember why you would have</b>	14:16	10	MR. GRENDI: Objection.	14:19
11	<b>looked through the names?</b>	14:16	11	MR. GAVENMAN: Objection.	14:19
12	A. Why would he look?	14:16	12	THE WITNESS: That, I don't know.	14:19
13	<b>Q. No. Why you would have?</b>	14:17	13	BY MR. GREIM:	14:19
14	MR. GAVENMAN: Objection.	14:17	14	<b>Q. Do you know whether he shared this</b>	14:19
15	THE WITNESS: I think -- I don't remember	14:17	15	<b>information with any of research group after</b>	14:19
16	exactly how when they first come out. The first time	14:17	16	<b>Strategic Vision?</b>	14:19
17	I look at this name, I don't remember exactly, but I	14:17	17	A. I didn't know that either.	14:19
18	did see the list either in New York or in French's	14:17	18	MR. GAVENMAN: Objection.	14:19
19	house, but I just don't remember exactly where.	14:17	19	BY MR. GREIM:	14:19
20	BY MR. GREIM:	14:17	20	<b>Q. Do you know whether he ever hired a</b>	14:19
21	<b>Q. Okay. Do you remember forming any --</b>	14:17	21	<b>group called ASOG out of Texas?</b>	14:19
22	<b>let me just ask you this: Do you remember having any</b>	14:17	22	A. ASOG? No.	14:19
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1	<b>thoughts about whether some of these names would be</b>	14:17	1	<b>Q. Do you know whether he hired an</b>	14:19
2	<b>good subjects for research?</b>	14:17	2	<b>individual named Adam Craft?</b>	14:19
3	A. I think they're all good subjects for	14:17	3	A. No.	14:19
4	research.	14:17	4	<b>Q. Does that name ring a bell to you?</b>	14:19
5	<b>Q. Why is that?</b>	14:17	5	A. Not at all.	14:19
6	A. Because this is the key group in the	14:17	6	<b>Q. Does the name ASOG sound familiar to</b>	14:19
7	control of China's bank system and investment.	14:17	7	<b>you?</b>	14:19
8	<b>Q. So do you know that that's what all</b>	14:17	8	A. Not at all.	14:20
9	<b>these names have in common?</b>	14:18	9	<b>Q. So what did Mr. Guo tell you about this</b>	14:20
10	A. Yes, except --	14:18	10	<b>list, if anything?</b>	14:20
11	MR. GAVENMAN: Objection.	14:18	11	A. He didn't really discuss this list with	14:20
12	THE WITNESS: -- there's -- huh?	14:18	12	me at all, but when I saw it, I know what he's after.	14:20
13	MR. GAVENMAN: Objection to form. You can	14:18	13	<b>Q. Is some of the same information that's</b>	14:20
14	answer.	14:18	14	<b>in this list already on the internet? Have you seen</b>	14:20
15	THE WITNESS: Except there's also like the	14:18	15	<b>it on there?</b>	14:20
16	former party chief's grandson, but for Wang Qishan's	14:18	16	MR. GRENDI: Objection.	14:20
17	group, may of the names here that were in Wang	14:18	17	MR. GAVENMAN: Objection.	14:20
18	Qishan's group, I think they're all involved in	14:18	18	THE WITNESS: There might be some.	14:20
19	Chinese banging corruption.	14:18	19	BY MR. GREIM:	14:20
20	BY MR. GREIM:	14:18	20	<b>Q. Do you have any understanding about who</b>	14:20
21	<b>Q. What's the name? Could you spell out</b>	14:18	21	<b>actually paid Strategic Vision, if anyone, for the</b>	14:20
22	<b>the name that you're telling us? Wang?</b>	14:18	22	<b>work under this agreement?</b>	14:20
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1	MR. GRENDI: Objection.	14:20	1	A. No.	14:22
2	THE WITNESS: I have no idea.	14:20	2	<b>Q. Why not?</b>	14:22
3	BY MR. GREIM:	14:20	3	A. Because I know she is with him for, you	14:22
4	<b>Q. Do you know if it was Guo himself?</b>	14:20	4	know, 16 years at the time. So he trusted her very	14:22
5	MR. GAVENMAN: Objection.	14:21	5	much.	14:23
6	THE WITNESS: I have no idea.	14:21	6	<b>Q. But why would Mr. Guo tell other people</b>	14:23
7	BY MR. GREIM:	14:21	7	<b>that he did not trust her?</b>	14:23
8	<b>Q. Do you know whether Guo consulted with</b>	14:21	8	MR. GRENDI: Objection.	14:23
9	<b>anyone else in coming up with the names?</b>	14:21	9	MR. GAVENMAN: Objection.	14:23
10	MR. GAVENMAN: Objection.	14:21	10	THE WITNESS: I have no idea.	14:23
11	MR. GRENDI: Objection.	14:21	11	BY MR. GREIM:	14:23
12	THE WITNESS: He might have, but he didn't	14:21	12	<b>Q. Well, do you know why you, once again,</b>	14:23
13	mention that to me.	14:21	13	<b>replaced Yvette Wang later on in the parties'</b>	14:23
14	BY MR. GREIM:	14:21	14	<b>dealings?</b>	14:23
15	<b>Q. Do you know whether Guo planned to share</b>	14:21	15	MR. GRENDI: Objection.	14:23
16	<b>the research results from this agreement with any</b>	14:21	16	MR. GAVENMAN: Objection.	14:23
17	<b>other person?</b>	14:21	17	THE WITNESS: I think he tried to salvage the	14:23
18	MR. GRENDI: Objection.	14:21	18	project. He saw the project falling apart because he	14:23
19	MR. GAVENMAN: Objection, form	14:21	19	didn't get what he is paying for and he thought maybe	14:23
20	THE WITNESS: I didn't know that.	14:21	20	I can better communicate with French and Mike's team	14:23
21	BY MR. GREIM:	14:21	21	and get what he's looking for.	14:23
22	<b>Q. So do you recall, roughly, the date when</b>	14:21	22	BY MR. GREIM:	14:24
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1	-- well, let me back up for a second.	14:22	1	<b>Q. Okay. Do you know whether Strategic</b>	14:24
2	<b>I understand your testimony to be that while</b>	14:22	2	<b>Vision wanted to have you as their point, their main</b>	14:24
3	<b>you were involved with Mr. Guo and Strategic Vision,</b>	14:22	3	<b>point of contact?</b>	14:24
4	<b>some deal was agreed to in principle. Correct?</b>	14:22	4	MR. GAVENMAN: Objection.	14:24
5	A. Yes.	14:22	5	THE WITNESS: Yes.	14:24
6	MR. GRENDI: Objection.	14:22	6	BY MR. GREIM:	14:24
7	BY MR. GREIM:	14:22	7	<b>Q. And did they say why that was?</b>	14:24
8	<b>Q. Then at that point, Yvette Wang came in</b>	14:22	8	MR. GAVENMAN: Objection.	14:24
9	<b>to take over negotiating the details of the contract</b>	14:22	9	THE WITNESS: I think they feel they can	14:24
10	<b>itself?</b>	14:22	10	better communicate with me and also they trust me, I	14:24
11	MR. GAVENMAN: Objection.	14:22	11	think.	14:24
12	MR. GRENDI: Objection.	14:22	12	BY MR. GREIM:	14:24
13	THE WITNESS: Yes.	14:22	13	<b>Q. By the way, did you discuss with</b>	14:24
14	BY MR. GREIM:	14:22	14	<b>Strategic Vision the importance of not using Chinese</b>	14:24
15	<b>Q. Did it -- knowing that Mr. Guo had been</b>	14:22	15	<b>entities as either the contracting parties or the</b>	14:24
16	<b>concerned about Ms. Wang earlier, did it surprise you</b>	14:22	16	<b>funding parties for the contract?</b>	14:24
17	<b>that she was brought in to negotiate the contract?</b>	14:22	17	MR. GAVENMAN: Objection.	14:24
18	MR. GRENDI: Objection.	14:22	18	MR. GRENDI: Objection.	14:24
19	MR. GAVENMAN: Objection.	14:22	19	THE WITNESS: I didn't remember specifically	14:25
20	THE WITNESS: No.	14:22	20	that suggestion.	14:25
21	BY MR. GREIM:	14:22	21	BY MR. GREIM:	14:25
22	<b>Q. Did it concern you?</b>	14:22	22	<b>Q. Knowing what you know about the mainland</b>	14:25
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1	<b>and about the Chinese Government --</b>	14:25	1	MR. GAVENMAN: Objection.	14:27
2	A. Right.	14:25	2	THE WITNESS: It's possible, yes. Hong Kong	14:27
3	<b>Q. -- do you agree that it would be prudent</b>	14:25	3	has a different system, but China has a lot of	14:27
4	<b>not to use a Chinese entity or a Chinese bank to pay</b>	14:25	4	difference there.	14:27
5	<b>Strategic Vision under the contract?</b>	14:25	5	BY MR. GREIM:	14:27
6	MR. GRENDI: Objection.	14:25	6	<b>Q. When did you first hear of the entity</b>	14:27
7	MR. GAVENMAN: Objection.	14:25	7	<b>called Eastern Profit?</b>	14:27
8	THE WITNESS: I didn't -- I -- from the very	14:25	8	A. I don't think I ever heard that term	14:27
9	beginning, we want to keep this highly confidential.	14:25	9	until this case, you know, showed up.	14:27
10	Everything we do has to be, you know, like very	14:25	10	<b>Q. Did you know that Mr. Guo's daughter is</b>	14:27
11	cautious, and whether I made that specific	14:25	11	<b>the sole shareholder and director of Eastern Profit?</b>	14:27
12	suggestion, I don't remember, but if I did, it must	14:25	12	MR. GRENDI: Objection.	14:27
13	be based on that principle.	14:25	13	MR. GAVENMAN: Objection.	14:27
14	BY MR. GREIM:	14:25	14	THE WITNESS: No.	14:27
15	<b>Q. And that would be common sense, wouldn't</b>	14:25	15	BY MR. GREIM:	14:27
16	<b>it?</b>	14:25	16	<b>Q. Do you know whether Mr. Guo typically</b>	14:27
17	MR. GRENDI: Objection.	14:25	17	<b>has his children hold companies that he uses for his</b>	14:27
18	MR. GAVENMAN: Objection.	14:25	18	<b>projects?</b>	14:27
19	THE WITNESS: It is not necessarily Chinese	14:25	19	A. I didn't.	14:28
20	company. I think it's how confidential, how	14:25	20	MR. GRENDI: Objection.	14:28
21	trustworthy they are, not the entities, from where.	14:26	21	MR. GAVENMAN: Objection.	14:28
22	It's the discrete nature of the entity that matters.	14:26	22	THE WITNESS: I didn't know.	14:28
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1	BY MR. GREIM:	14:26	1	BY MR. GREIM:	14:28
2	<b>Q. Well, what about the ability of Chinese</b>	14:26	2	<b>Q. Did you always understand that</b>	14:28
3	<b>officials to follow the wire from, you know, a</b>	14:26	3	<b>regardless of who signed the contract that that</b>	14:28
4	<b>Chinese account directly to Strategic Vision?</b>	14:26	4	<b>person or entity would be reporting to Mr. Guo?</b>	14:28
5	MR. GRENDI: Objection.	14:26	5	MR. GRENDI: Objection.	14:28
6	MR. GAVENMAN: Objection.	14:26	6	MR. GAVENMAN: Objection to form.	14:28
7	THE WITNESS: Well, yeah. It's definitely	14:26	7	THE WITNESS: Yes.	14:28
8	easier to track if it's a Chinese company based in	14:26	8	BY MR. GREIM:	14:28
9	China.	14:26	9	<b>Q. Have you ever heard that Hansheng Wang</b>	14:28
10	BY MR. GREIM:	14:26	10	<b>was actually in charge of Eastern Profit?</b>	14:28
11	<b>Q. What about an entity based in Hong Kong?</b>	14:26	11	A. I didn't know that. I thought you said	14:28
12	MR. GAVENMAN: Objection to form.	14:26	12	his daughter.	14:28
13	MR. GRENDI: Objection.	14:26	13	<b>Q. Would it surprise to hear that in this</b>	14:28
14	MR. GAVENMAN: I'm not sure what that	14:26	14	<b>case, Eastern Profit claims that its principal is</b>	14:28
15	question even is. Can you rephrase that question?	14:26	15	<b>Hansheng Wang?</b>	14:28
16	THE WITNESS: Yes.	14:27	16	MR. GAVENMAN: Objection, form.	14:28
17	BY MR. GREIM:	14:27	17	THE WITNESS: I have no idea.	14:28
18	<b>Q. Did you understand it?</b>	14:27	18	BY MR. GREIM:	14:28
19	A. Maybe you can rephrase.	14:27	19	<b>Q. Did you ever talk to Hansheng Wang about</b>	14:28
20	<b>Q. Is it also easier to track if the money</b>	14:27	20	<b>this project at all?</b>	14:29
21	<b>comes from an entity based in Hong Kong?</b>	14:27	21	A. No.	14:29
22	MR. GRENDI: Objection.	14:27	22	<b>Q. Would it surprise if Hansheng Wang was</b>	14:29
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1	<b>in charge of a research project like for this for Mr. Guo?</b>	14:29	1	<b>Q. And then if you keep going -- I think it's still the same thread -- you'll go to page 1869. You'll see that toward the top, she says: "Also on other fav subject, Y mentioned on Wed she needs to get back to NY to collect her bonus for the year. So she would be excited that NY would be glad that we had an agreement finally."</b>	14:31
2		14:29	2	<b>Does that appear to be a reference to Yvette Wang?</b>	14:32
3	MR. GRENDI: Objection.	14:29	3	A. Correct.	14:32
4	MR. GAVENMAN: Objection, form.	14:29	4	MR. GAVENMAN: Objection.	14:32
5	THE WITNESS: As I said, nothing surprises me.	14:29	5	MR. GRENDI: Objection.	14:32
6		14:29	6	BY MR. GREIM:	14:32
7	BY MR. GREIM:	14:29	7	<b>Q. Does it appear to you that by December 30th, Yvette Wang was now negotiating directly with French Wallop?</b>	14:32
8	<b>Q. Have you ever heard of an entity called Celestial Tide Holdings?</b>	14:29	8	A. Yes.	14:32
9		14:29	9	MR. GAVENMAN: Objection.	14:32
10	A. Never.	14:29	10	MR. GREIM: All right. Let's go ahead and take a break at that point, because we're about done with the video.	14:32
11	<b>Q. Do you recall that after Yvette Wang came in to finalize the contract with Strategic Vision that new disputes erupted?</b>	14:30	11	VIDEOGRAPHER: This ends Disk No. 2, going	14:32
12		14:30	12		
13	MR. GRENDI: Objection.	14:30	13		
14	MR. GAVENMAN: Objection.	14:30	14		
15	THE WITNESS: I didn't. If I did, maybe from French, not from Miles or Yvette.	14:30	15		
16		14:30	16		
17	BY MR. GREIM:	14:30	17		
18	<b>Q. Okay. If you look on December 30th, this is on page 1867 of Han Exhibit 10.</b>	14:30	18		
19		14:30	19		
20	A. 67?	14:30	20		
21		14:30	21		
22	<b>Q. Um-hum.</b>	14:30	22		
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1	A. There it is. Yeah.	14:30	1	off the record. The time is now 2:34 p.m.	14:32
2	<b>Q. You'll see that Ms. Wallop begins that day responding to a question from you about the other matter that you were working on.</b>	14:30	2	[Recess.]	14:52
3		14:30	3	VIDEOGRAPHER: This begins Disk No. 3 in the video deposition of Lianchao Han. We are back on the record. The time is 2:54 p.m.	14:52
4	A. Yes.	14:31	4		14:52
5	<b>Q. It looks like you were taking some CLE.</b>	14:31	5	BY MR. GREIM:	14:52
6	A. Yes.	14:31	6	<b>Q. Mr. Han, welcome back.</b>	14:52
7		14:31	7	A. Thank you.	14:52
8	<b>Q. And you see at the bottom of that, the first thing she says: "What time on Tuesday? Did you speak with NY?"</b>	14:31	8	<b>Q. If you could, we left on page 1869, but I've got a question for you -- this is still in Exhibit 10 -- about the pages 1884 through 1903, which is the last page.</b>	14:53
9		14:31	9		14:53
10	A. Let me see.	14:31	10	A. Right.	14:53
11	<b>Q. It's right before the three emojis.</b>	14:31	11	<b>Q. And my question for you is would you agree with me that everything from 1884 to 1903 refers to matters other than the Strategic Vision Eastern Profit contract?</b>	14:53
12		14:31	12		14:53
13	A. Okay. "What time on Tuesday? Did you speak with NY?"	14:31	13	A. I think most the time, most of it, yes.	14:53
14		14:31	14	That's correct, except maybe 86.	14:53
15	Yeah. Yeah. That's New York. It refers to Miles Kwok.	14:31	15	<b>Q. Oh.</b>	14:53
16		14:31	16	A. I think that looks like --	14:53
17	<b>Q. Okay. And you'll see that she goes on that morning and sends you some hotel recommendations?</b>	14:31	17	<b>Q. Yeah.</b>	14:53
18		14:31	18		
19	A. Yes.	14:31	19		
20	<b>Q. And many other things?</b>	14:31	20		
21		14:31	21		
22	A. Yes.	14:31	22		
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1	A. -- about their disputes.	14:53	1	A. Um-hum.	14:56
2	<b>Q. Okay. And that's a text exchange on</b>	14:53	2	<b>Q. Did you have any understanding that</b>	14:56
3	<b>February 26th, it looks like. Right?</b>	14:53	3	<b>Yvette Wang was a project manager on this?</b>	14:56
4	A. Yes.	14:54	4	MR. GAVENMAN: Object to the form.	14:56
5	<b>Q. Okay. All right. Then I guess -- all</b>	14:54	5	MR. GRENDI: Objection.	14:56
6	<b>right. I follow you. I guess on February 28th, on</b>	14:54	6	THE WITNESS: I didn't know until maybe	14:56
7	<b>1887, that is about the lawsuit as well.</b>	14:54	7	later.	14:56
8	A. Correct. I mean the dispute of some	14:54	8	BY MR. GREIM:	14:56
9	sort.	14:54	9	<b>Q. Okay.</b>	14:56
10	<b>Q. Okay. So would you agree with me,</b>	14:54	10	A. Not at that point.	14:56
11	<b>though, that everything else in here is about other</b>	14:54	11	<b>Q. Had you ever heard that title used with</b>	14:56
12	<b>work that you were discussing with Ms. Wallop?</b>	14:54	12	<b>respect to Yvette Wang, that she was a project</b>	14:56
13	A. Correct.	14:54	13	<b>manager?</b>	14:56
14	<b>Q. Did any of those dealings come to</b>	14:54	14	A. I didn't know. I didn't, no.	14:56
15	<b>fruition?</b>	14:54	15	<b>Q. Now you said until maybe later. Was</b>	14:56
16	A. No.	14:54	16	<b>there some point where you did learn that she was</b>	14:56
17	<b>Q. Let me ask you -- let's go back to 1869.</b>	14:54	17	<b>project manager?</b>	14:57
18	A. Yeah.	14:54	18	MR. GAVENMAN: Objection to form.	14:57
19	<b>Q. And I want you to focus on after the</b>	14:54	19	MR. GRENDI: Objection.	14:57
20	<b>three question marks that end a sentence somewhere</b>	14:54	20	THE WITNESS: I don't think they ever used	14:57
21	<b>about in the middle or so.</b>	14:55	21	the project manager, but she is in charge of the	14:57
22	A. 89?	14:55	22	project.	14:57
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1	<b>Q. On 1869.</b>	14:55	1	BY MR. GREIM:	14:57
2	A. 69?	14:55	2	<b>Q. If you look at page 1879 and go to the</b>	14:57
3	<b>Q. Yeah.</b>	14:55	3	<b>top --</b>	14:57
4	A. Sorry. Okay.	14:55	4	A. Yeah.	14:57
5	<b>Q. Three question marks, and then Ms.</b>	14:55	5	<b>Q. -- you see this is a carryover from the</b>	14:57
6	<b>Wallop says: "I naturally asked tea or water ginger</b>	14:55	6	<b>previous page.</b>	14:57
7	<b>ale, and her comment, quote, no, we need to talk</b>	14:55	7	A. Right.	14:57
8	<b>about agreement. I spoke for two hours with HK and</b>	14:55	8	<b>Q. But Ms. Wallop is sending you a piece</b>	14:57
9	<b>they told me I cannot sign for monthly amount,</b>	14:55	9	<b>about HNA that was in "The Financial Times". Do you</b>	14:57
10	<b>exclamation point, but her boss told her to do it and</b>	14:55	10	<b>see that?</b>	14:58
11	<b>come back with signed doc."</b>	14:55	11	A. Okay.	14:58
12	<b>Did I read that right?</b>	14:55	12	[Witness peruses exhibit.]	14:58
13	A. Um-hum.	14:55	13	THE WITNESS: Okay.	14:58
14	<b>Q. Now, did you ever hear Yvette Wang or</b>	14:55	14	BY MR. GREIM:	14:58
15	<b>Mr. Guo talk about having to check with individuals</b>	14:55	15	<b>Q. And then your response to her is: "I</b>	14:58
16	<b>in Hong Kong?</b>	14:56	16	<b>gave the story to WSJ a week ago. They're too slow,</b>	14:58
17	A. No.	14:56	17	<b>but we have more details."</b>	14:58
18	<b>Q. If you go to page 1871, after the emojis</b>	14:56	18	<b>And then continuing to the next page: "My</b>	14:58
19	<b>toward the top, you'll see: "She said and as she</b>	14:56	19	<b>advice is to focus on what already in place to</b>	14:58
20	<b>kept saying with abundant authority, I am project</b>	14:56	20	<b>harvest and what will be harvested would be harvested</b>	14:58
21	<b>manager. I decide."</b>	14:56	21	<b>in the next batch. Good luck."</b>	14:58
22	<b>Do you see that?</b>	14:56	22	<b>Did I read the right?</b>	14:58
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1	A. Yes.	14:58	1	supposed to touch them, even look into them. I don't	15:01
2	<b>Q. What was your intent -- first of all,</b>	14:58	2	know if that's true or not, but I said my point is	15:01
3	<b>were you talking to her about the Strategic Vision</b>	14:58	3	even if you have five people you can't touch, but	15:01
4	<b>work?</b>	14:58	4	there's so many on the list. At least you need to	15:01
5	MR. GAVENMAN: Objection to form.	14:58	5	produce something substantial that will satisfy Miles	15:01
6	MR. GRENDI: Objection.	14:58	6	and the contractual, you know, obligations and	15:01
7	THE WITNESS: When was this?	14:58	7	satisfy Miles; otherwise, I said we're going to be	15:01
8	Okay. But we have more detail. Okay. Yeah.	14:58	8	trouble. I think that's what I see coming. Miles	15:02
9	I know what -- can you reframe your question, please?	14:59	9	will terminate the contract. There will be lawsuits	15:02
10	BY MR. GREIM:	14:59	10	going on between the two sides, exactly what I said	15:02
11	<b>Q. Sure. Were you speaking with her about</b>	14:59	11	at the time.	15:02
12	<b>the Strategic Vision work on the research?</b>	14:59	12	<b>Q. And that what you were trying to avoid</b>	15:02
13	MR. GRENDI: Objection.	14:59	13	<b>here?</b>	15:02
14	MR. GAVENMAN: Objection, form.	14:59	14	A. Correct.	15:02
15	THE WITNESS: Yeah. It looks like it.	14:59	15	MR. GRENDI: Objection.	15:02
16	BY MR. GREIM:	14:59	16	MR. GREIM: Okay. I'm now going to show you	15:02
17	<b>Q. And what was your advice to her?</b>	14:59	17	what we marked in another deposition as Exhibit 5.	15:02
18	A. I don't remember specifically. It looks	14:59	18	[Wang Exhibit No. 5 was	15:02
19	like my advice is to focus on what's already in place	14:59	19	identified for the record.]	15:02
20	to harvest and what will be harvested in the next	14:59	20	BY MR. GREIM:	15:02
21	batch. Yeah. I think that I advised them to follow	14:59	21	<b>Q. And these are -- this is Wang Exhibit 5,</b>	15:02
22	the schedule of the deliverables, don't deviate from	14:59	22	<b>Bates labeled SVUS000061 to 76. These are a series</b>	15:02
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1	that.	14:59	1	<b>of texts between you and not Ms. Wallop, but,</b>	15:02
2	<b>Q. So let me move on now to 1882 and you'll</b>	14:59	2	<b>instead, with Mr. Waller.</b>	15:02
3	<b>see -- this is probably the last thing we'll get to</b>	15:00	3	A. Um-hum.	15:03
4	<b>in this packet here. You'll see on February 17,</b>	15:00	4	<b>Q. And so the very first thing we see here</b>	15:03
5	<b>2018, you say: "F, I am disappointed with the</b>	15:00	5	<b>is from December 11, 2017, and I think the first</b>	15:03
6	<b>result. Even there are five RP people, but we still</b>	15:00	6	<b>order of business is let's figure out who's dark gray</b>	15:03
7	<b>many left. We didn't get anything. It put me in a</b>	15:00	7	<b>and who's light gray.</b>	15:03
8	<b>very difficult spot. More importantly, it failed to</b>	15:00	8	A. Okay.	15:03
9	<b>advance our agenda. We have to push the teams to</b>	15:00	9	<b>Q. So can you tell so far which one of</b>	15:03
10	<b>produce and we will in trouble."</b>	15:00	10	<b>these two speakers is you?</b>	15:03
11	<b>Then you go and it looks like you discuss</b>	15:00	11	A. I think the light gray, that must be me.	15:03
12	<b>another topic for the end of that.</b>	15:00	12	<b>Q. Okay.</b>	15:03
13	<b>What were you referring to in that first</b>	15:00	13	A. Because mine is short. I type really	15:03
14	<b>paragraph with five RP people?</b>	15:00	14	slow.	15:03
15	A. Yeah. This, if I recall correctly, this	15:00	15	<b>Q. Well, you are definitely a shorter</b>	15:03
16	was Miles put me back in charge, in charge of	15:00	16	<b>texter than most people. You don't use emojis.</b>	15:03
17	managing the project, and I think Mike French and the	15:01	17	A. I don't.	15:03
18	team didn't produce anything of substance. So I said	15:01	18	<b>Q. So is it -- does it appear to you that</b>	15:03
19	I'm really disappointed with the result.	15:01	19	<b>you met with at least Mr. Waller around December 11,</b>	15:03
20	They claimed the difficulty of extracting	15:01	20	<b>2017.</b>	15:04
21	information, because there are five people that is on	15:01	21	A. Yeah. I don't recall the specific date.	15:04
22	the restriction of American Government. You're not	15:01	22	<b>Q. Right.</b>	15:04
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<p>1 A. And I don't know where we met, because 15:04</p> <p>2 he was -- he didn't show up -- no. I don't remember 15:04</p> <p>3 was he in the first meeting with Miles. Probably 15:04</p> <p>4 not. He was behind. Yeah. I don't recall 15:04</p> <p>5 specifically the date. 15:04</p> <p>6 <b>Q. Did you feel that you had a good rapport</b> 15:04</p> <p>7 <b>with Mr. Waller?</b> 15:04</p> <p>8 A. What? 15:04</p> <p>9 <b>Q. Did you feel that you a good rapport</b> 15:04</p> <p>10 <b>with Mr. Waller?</b> 15:04</p> <p>11 A. Yes. 15:04</p> <p>12 <b>Q. In fact, did you share the same mentor,</b> 15:04</p> <p>13 <b>someone named Bernie?</b> 15:04</p> <p>14 A. Correct. Yes. 15:04</p> <p>15 <b>Q. And so Bernie had been -- had served</b> 15:04</p> <p>16 <b>with Chaing Kai-shek or something like that?</b> 15:04</p> <p>17 A. He was hero in anti-Japanese war. He 15:04</p> <p>18 was involved in the KMT, the Taiwan Government 15:04</p> <p>19 intelligence. 15:05</p> <p>20 <b>Q. I see. So he was a mentor to you, but</b> 15:05</p> <p>21 <b>also a mentor to Mr. Waller?</b> 15:05</p> <p>22 A. Correct. 15:05</p> <p style="text-align: right;">Page 198</p>	<p>1 <b>could not provide. I hope your trip is fruitful."</b> 15:06</p> <p>2 <b>Do you see that?</b> 15:06</p> <p>3 A. Um-hum. 15:06</p> <p>4 <b>Q. And then you say: Great meeting with</b> 15:06</p> <p>5 <b>our friend. He is coming in two weeks in</b> 15:06</p> <p>6 <b>Washington."</b> 15:06</p> <p>7 <b>Who are you speaking of there?</b> 15:06</p> <p>8 A. I think this is a friend from Tokyo. 15:06</p> <p>9 <b>Q. This is Tokyo?</b> 15:06</p> <p>10 A. Yeah. 15:06</p> <p>11 <b>Q. Is Mr. Waller talking about this</b> 15:06</p> <p>12 <b>particular project or another one? Can you tell?</b> 15:06</p> <p>13 MR. GAVENMAN: Objection, form. 15:06</p> <p>14 MR. GRENDI: Objection. 15:06</p> <p>15 THE WITNESS: 62? 15:06</p> <p>16 BY MR. GREIM: 15:06</p> <p>17 <b>Q. Um-hum.</b> 15:06</p> <p>18 A. Another week's time -- I think this is 15:06</p> <p>19 talking about -- he's talking about Miles' research 15:07</p> <p>20 project. 15:07</p> <p>21 <b>Q. Well, were there some things that</b> 15:07</p> <p>22 <b>Strategic Vision said that they could not provide and</b> 15:07</p> <p style="text-align: right;">Page 200</p>
<p>1 <b>Q. But probably not at the same time?</b> 15:05</p> <p>2 A. Roughly around the time. 15:05</p> <p>3 <b>Q. Oh, around the same time. Okay.</b> 15:05</p> <p>4 A. Yes. 15:05</p> <p>5 <b>Q. Sorry.</b> 15:05</p> <p>6 <b>Okay. So let's go to the next page. You'll</b> 15:05</p> <p>7 <b>see that on December the 14th now, the dark gray is</b> 15:05</p> <p>8 <b>saying: "I had a very productive meeting with a key</b> 15:05</p> <p>9 <b>capabilities person who is ready. I asked him for</b> 15:05</p> <p>10 <b>another week's time to we don't lose his team. He</b> 15:05</p> <p>11 <b>agreed."</b> 15:05</p> <p>12 <b>Do you see that?</b> 15:05</p> <p>13 A. Yes. 15:05</p> <p>14 <b>Q. Do you recall what Mr. Waller is telling</b> 15:05</p> <p>15 <b>you there, what he's talk about?</b> 15:05</p> <p>16 A. I don't. No. I don't remember 15:05</p> <p>17 specifically -- 15:06</p> <p>18 <b>Q. Okay.</b> 15:06</p> <p>19 A. -- the content. 15:06</p> <p>20 <b>Q. Let's go down a few days later. Mr.</b> 15:06</p> <p>21 <b>Waller says: "We can now provide the entire menu</b> 15:06</p> <p>22 <b>that the friend requested, including items we said we</b> 15:06</p> <p style="text-align: right;">Page 199</p>	<p>1 <b>then they say, no, they could?</b> 15:07</p> <p>2 MR. GRENDI: Objection, form. 15:07</p> <p>3 MR. GAVENMAN: Objection. 15:07</p> <p>4 THE WITNESS: I don't specifically recall 15:07</p> <p>5 what they say they cannot provide. I think 15:07</p> <p>6 everything is based on what's in the contract. 15:07</p> <p>7 BY MR. GREIM: 15:07</p> <p>8 <b>Q. Okay.</b> 15:07</p> <p>9 A. If they said they can't provide, that's 15:07</p> <p>10 supposed to be specified in the contract. 15:07</p> <p>11 <b>Q. Let me direct you now to the December</b> 15:07</p> <p>12 <b>23rd texts. They go from 64 to 65.</b> 15:07</p> <p>13 A. 65. 15:07</p> <p>14 <b>Q. It starts off with Mr. Waller asking</b> 15:07</p> <p>15 <b>you: "Any news?"</b> 15:07</p> <p>16 A. Any news? Yeah. This is, again, I 15:07</p> <p>17 think this is the Tokyo guy. 15:08</p> <p>18 <b>Q. Okay. And then what about your text at</b> 15:08</p> <p>19 <b>6:19 a.m.?</b> 15:08</p> <p>20 <b>You say -- it looks like Mr. Waller says:</b> 15:08</p> <p>21 <b>"What about the guy we saw last week?"</b> 15:08</p> <p>22 <b>And then you respond: "I will ask."</b> 15:08</p> <p style="text-align: right;">Page 201</p>

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<p>1 <b>Waller's E-mail of concern -- or I'm sorry -- text of</b> 15:24</p> <p>2 <b>concern, which is at SVUS000072, you see he discusses</b> 15:24</p> <p>3 <b>the concerns that we just talk about.</b> 15:24</p> <p>4 A. Yeah. 15:24</p> <p>5 <b>Q. Then you can see your response at 10:20</b> 15:24</p> <p>6 <b>on December 28t: "I appreciate your trust. I think</b> 15:24</p> <p>7 <b>it is important to get him to sign the contract."</b> 15:24</p> <p>8 <b>Are you talking about Mr. Guo?</b> 15:24</p> <p>9 A. Yes. 15:24</p> <p>10 <b>Q. You see we can work on security later.</b> 15:24</p> <p>11 <b>He wants me to work for him exclusively, which I have</b> 15:24</p> <p>12 <b>to think about.</b> 15:24</p> <p>13 A. Correct. 15:24</p> <p>14 <b>Q. So is it something you were still</b> 15:24</p> <p>15 <b>considering on December 28th?</b> 15:24</p> <p>16 MR. GRENDI: Objection. 15:24</p> <p>17 MR. GAVENMAN: Objection. 15:24</p> <p>18 THE WITNESS: Yes. 15:24</p> <p>19 BY MR. GREIM: 15:24</p> <p>20 <b>Q. When did you decide that it was</b> 15:24</p> <p>21 <b>something you really did not want to do?</b> 15:24</p> <p>22 MR. GRENDI: Objection. 15:24</p> <p style="text-align: right;">Page 218</p>	<p>1 A. Yes. 15:26</p> <p>2 <b>Q. Now let me stop you there for a second.</b> 15:26</p> <p>3 <b>Do you see that above that, back on December 28th,</b> 15:26</p> <p>4 <b>you had forecast that Yvette wanted to talk about the</b> 15:26</p> <p>5 <b>deposit?</b> 15:26</p> <p>6 MR. GAVENMAN: Objection. 15:26</p> <p>7 MR. GRENDI: Objection. 15:26</p> <p>8 MR. GAVENMAN: Form. 15:26</p> <p>9 THE WITNESS: Which? 15:26</p> <p>10 BY MR. GREIM: 15:26</p> <p>11 <b>Q. If you look, we're on 73.</b> 15:26</p> <p>12 A. Yeah. 15:26</p> <p>13 <b>Q. If you go right above there, that's on</b> 15:26</p> <p>14 <b>December 30th. Go back to the 28th.</b> 15:26</p> <p>15 <b>You see he asks you, he says: "Okay. Do you</b> 15:26</p> <p>16 <b>think the contract will be signed today?"</b> 15:26</p> <p>17 <b>And then you say: "Don't know. I think he</b> 15:26</p> <p>18 <b>wants to talk about the deposit."</b> 15:26</p> <p>19 A. Right. 15:26</p> <p>20 <b>Q. So does that make you think maybe you</b> 15:26</p> <p>21 <b>were privy to discussions between Yvette and Mr. Guo</b> 15:26</p> <p>22 <b>before she was sent down to sign the contract?</b> 15:26</p> <p style="text-align: right;">Page 220</p>
<p>1 MR. GAVENMAN: Objection. 15:24</p> <p>2 THE WITNESS: I have no idea when. 15:24</p> <p>3 BY MR. GREIM: 15:24</p> <p>4 <b>Q. Even while Yvette Wang was negotiating</b> 15:24</p> <p>5 <b>with Strategic Vision, were you still getting some</b> 15:25</p> <p>6 <b>information about the negotiations?</b> 15:25</p> <p>7 MR. GRENDI: Objection. 15:25</p> <p>8 MR. GAVENMAN: Objection. 15:25</p> <p>9 THE WITNESS: Not from Miles, but from French 15:25</p> <p>10 and Mike a little bit. 15:25</p> <p>11 BY MR. GREIM: 15:25</p> <p>12 <b>Q. Right.</b> 15:25</p> <p>13 A. Whatever they could share. 15:25</p> <p>14 <b>Q. So if you look, for example, at the</b> 15:25</p> <p>15 <b>bottom of SVUS000073, you see Mike reaches out and</b> 15:25</p> <p>16 <b>says "Please call F". Is that French?</b> 15:25</p> <p>17 A. Yes. 15:26</p> <p>18 <b>Q. "We agreed on the deposit. That wasn't</b> 15:26</p> <p>19 <b>a problem. However, today, Y came back with major,</b> 15:26</p> <p>20 <b>reasonable changes to thing that we had agreed in</b> 15:26</p> <p>21 <b>writing on December 12th."</b> 15:26</p> <p>22 <b>Do you see that?</b> 15:26</p> <p style="text-align: right;">Page 219</p>	<p>1 A. Absolutely no. 15:27</p> <p>2 MR. GRENDI: Objection. 15:27</p> <p>3 MR. GAVENMAN: Objection. 15:27</p> <p>4 THE WITNESS: No. 15:27</p> <p>5 BY MR. GREIM: 15:27</p> <p>6 <b>Q. No?</b> 15:27</p> <p>7 A. No. I'm pretty sure about that. 15:27</p> <p>8 <b>Q. Okay. And let's now move to 74. After</b> 15:27</p> <p>9 <b>Mr. Waller raises his concern about changes being</b> 15:27</p> <p>10 <b>proposed by Yvette, you see you respond later that</b> 15:27</p> <p>11 <b>day on the 30th and you say: "I talked with F."</b> 15:27</p> <p>12 <b>That's French. Right?</b> 15:27</p> <p>13 A. Yes. 15:27</p> <p>14 <b>Q. "It's better to wait a couple of days.</b> 15:27</p> <p>15 <b>Miles -- that's Mr. Guo?</b> 15:27</p> <p>16 A. Yes. 15:27</p> <p>17 <b>Q. "Communicated with me a few times today,</b> 15:27</p> <p>18 <b>but did not mention the failure."</b> 15:27</p> <p>19 A. Right. 15:27</p> <p>20 <b>Q. Did you see that?</b> 15:27</p> <p>21 A. Yes. 15:27</p> <p>22 <b>Q. Now, do you think it's possible that Mr.</b> 15:27</p> <p style="text-align: right;">Page 221</p>

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1	<b>Guo didn't know about the interaction between</b>	15:27	1	<b>Q. I guess I'll tell you this. Feel free</b>	15:31
2	<b>Ms. Wang and French?</b>	15:27	2	<b>to look at the agreement if you want to. What I</b>	15:31
3	MR. GAVENMAN: Objection to form.	15:27	3	<b>really wanted to ask is if you could remember having</b>	15:31
4	MR. GRENDI: Objection.	15:27	4	<b>an understanding about it.</b>	15:31
5	THE WITNESS: I have no idea. I don't think	15:27	5	A. About the deposit?	15:31
6	it's possible.	15:27	6	<b>Q. About the deposit.</b>	15:31
7	MR. GREIM: Okay. Now, earlier, I	15:27	7	A. I didn't know the end result of what	15:31
8	represented to you that the agreement was signed on	15:28	8	they put in the signed form.	15:31
9	January 6th. I'm going to show -- we're going to go	15:28	9	<b>Q. Okay. Then what about the contents of</b>	15:31
10	ahead and mark this even though it's been used	15:28	10	<b>the weekly reports; did you have an understanding</b>	15:31
11	before. I'll just mark it again. I'm going to show	15:28	11	<b>about -- if you want to look at the agreement because</b>	15:32
12	you what we're marking as Han Exhibit 11.	15:29	12	<b>you think it will refresh your memory, do it. That's</b>	15:32
13	[Han Exhibit No. 11 was	15:29	13	<b>fine, but I first want to ask you did you have an</b>	15:32
14	marked for identification.]	15:29	14	<b>understanding about what was going to be in those</b>	15:32
15	BY MR. GREIM:	15:29	15	<b>weekly reports?</b>	15:32
16	<b>Q. I'll represent to you that this is the</b>	15:29	16	MR. GRENDI: Objection to the form.	15:32
17	<b>final signed agreement. Could you turn to page 5.</b>	15:29	17	MR. GAVENMAN: Objection.	15:32
18	<b>It's labeled Eastern-000009.</b>	15:29	18	THE WITNESS: I have a rough idea, because I	15:32
19	<b>Can you tell us the name that is signed there</b>	15:29	19	think we discussed during the meeting he wants	15:32
20	<b>for Eastern Profit?</b>	15:29	20	something of substance, not, you know, junk	15:32
21	MR. GRENDI: Objection.	15:29	21	information, and that, I'm pretty sure.	15:32
22	THE WITNESS: It looks like Han G. Wang, but	15:29	22	BY MR. GREIM:	15:32
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1	it's script. It's hard to tell, but it looks like --	15:29	1	<b>Q. Do you recall, though, the idea that</b>	15:32
2	it's hard to tell, but maybe it's Han.	15:29	2	<b>there would be a ramp-up period, as Mr. Waller texted</b>	15:32
3	BY MR. GREIM:	15:30	3	<b>to you --</b>	15:32
4	<b>Q. Does it look like Yanping Wang?</b>	15:30	4	A. Yes.	15:32
5	A. No.	15:30	5	<b>Q. -- in which the reports would not be the</b>	15:32
6	<b>Q. What's the date that you seen underneath</b>	15:30	6	<b>same as the reports that would come later?</b>	15:32
7	<b>it?</b>	15:30	7	MR. GRENDI: Objection to form.	15:32
8	A. January 6th.	15:30	8	MR. GAVENMAN: Objection.	15:32
9	<b>Q. Did you understand whether the deposit</b>	15:30	9	THE WITNESS: He mentioned that to me. I	15:32
10	<b>would be refundable?</b>	15:30	10	also expressed my concern, those types, because the	15:33
11	MR. GAVENMAN: Objection, form.	15:31	11	assignments, the target is very clear. So there's no	15:33
12	MR. GRENDI: Objection.	15:31	12	point going around and around for those information	15:33
13	THE WITNESS: I don't know. Where is it in	15:31	13	that the client already has. I made that point so	15:33
14	the paper, in the document?	15:31	14	many times in the past.	15:33
15	BY MR. GREIM:	15:31	15	BY MR. GREIM:	15:33
16	<b>Q. If you see on page 5, under Payment</b>	15:31	16	<b>Q. Do you recall after an initial meeting</b>	15:33
17	<b>Terms --</b>	15:31	17	<b>that the start date of the contract was postponed?</b>	15:33
18	A. Yeah.	15:31	18	A. Say that again.	15:33
19	<b>Q. -- that's the reference that I see, but</b>	15:31	19	<b>Q. Do you recall that after an initial</b>	15:33
20	<b>I don't want to suggest to you an answer.</b>	15:31	20	<b>meeting that the start date of the contract was</b>	15:33
21	<b>[Witness peruses exhibit.]</b>	15:31	21	<b>postponed?</b>	15:33
22	BY MR. GREIM:	15:31	22	A. I was not involved in that. So I don't	15:33
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1	recall specifically. There are some glitches, you	15:34	1	and Rule of Law and perfectly, he mentioned many	15:37
2	know, like something going. I also remember French	15:34	2	times to me that he strongly opposed to CGP's	15:37
3	told me in the middle, you know, the wire transfer	15:34	3	dictatorship.	15:37
4	and Miles tried to stop the second payment.	15:34	4	<b>Q. When did he move from second to the</b>	15:37
5	<b>Q. I'm going to be -- make sure I'm a clear</b>	15:34	5	<b>third phase, overthrow CCP?</b>	15:37
6	<b>on a couple of questions about representations. I</b>	15:34	6	MR. GRENDI: Objection to form.	15:37
7	<b>know we covered these much earlier today, but I want</b>	15:34	7	MR. GAVENMAN: Objection to form.	15:37
8	<b>to make sure I've got them.</b>	15:34	8	THE WITNESS: I don't remember specifically.	15:37
9	A. Yeah.	15:34	9	We can go back and look at the timeline, but I don't	15:37
10	<b>Q. Did Guo represent to Strategic Vision</b>	15:34	10	remember.	15:37
11	<b>that he was a dissident?</b>	15:34	11	BY MR. GREIM:	15:37
12	MR. GAVENMAN: Objection, form.	15:34	12	<b>Q. Did you observe the information that was</b>	15:37
13	MR. GRENDI: Objection to form.	15:34	13	<b>loaded onto hard drives given by Yvette Wang to</b>	15:37
14	THE WITNESS: I don't think he specifically	15:34	14	<b>French Wallop?</b>	15:38
15	said he's a dissident, but I think he made his	15:35	15	MR. GAVENMAN: Objection to form.	15:38
16	intention clear to them that he's anti-CCP. This is	15:35	16	MR. GRENDI: Objection to form.	15:38
17	the agenda. The reason we're doing this is to	15:35	17	THE WITNESS: I think it might be -- Mike	15:38
18	disrupt the regime.	15:35	18	shoot me. I don't specifically remember. Maybe I	15:38
19	BY MR. GREIM:	15:35	19	recall that, but it's all junk, full of junk. I was	15:38
20	<b>Q. And when you say disrupt the regime,</b>	15:35	20	disappointed with that. I expressed my	15:38
21	<b>what do you mean by that?</b>	15:35	21	disappointment to Mike. It doesn't advance our	15:38
22	A. Just expose them to corruption, to the	15:35	22	agenda. It doesn't help the deliverables.	15:38
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1	scandals so that people will see the nature of the	15:35	1	Yes. I think I saw it.	15:38
2	Communist regime and even disturb internal power	15:35	2	BY MR. GREIM:	15:38
3	struggle among the leaders.	15:35	3	<b>Q. I'm sorry. My question was different</b>	15:38
4	<b>Q. Did he say it was his goal to actually</b>	15:35	4	<b>though.</b>	15:38
5	<b>overthrow the Communist Part?</b>	15:35	5	A. Okay. Sorry.	15:38
6	MR. GAVENMAN: Objection to form.	15:35	6	<b>Q. My question was whether you saw the hard</b>	15:38
7	MR. GRENDI: Objection to form.	15:35	7	<b>drives that Yvette Wang gave to French Wallop with</b>	15:38
8	THE WITNESS: That, I didn't remember	15:36	8	<b>the initial information to begin the research?</b>	15:38
9	specifically. I think Miles has been involved from	15:36	9	A. Oh, no. Maybe --	15:38
10	the original -- you know, the beginning of the 19 --	15:36	10	MR. GRENDI: Objection to the form.	15:38
11	2017 to this later stage.	15:36	11	MR. GAVENMAN: Objection to form.	15:38
12	Until now, there's an evolution going on with	15:36	12	THE WITNESS: Maybe French shoot me, but	15:38
13	him. He's political agenda are slight different in	15:36	13	French mentioned that when he installed, there some	15:38
14	each stage.	15:36	14	weird stuff going on.	15:39
15	BY MR. GREIM:	15:36	15	BY MR. GREIM:	15:39
16	<b>Q. What do you mean by that?</b>	15:36	16	<b>Q. Did you -- do you remember hearing that</b>	15:39
17	A. From the very beginning, you know, I	15:36	17	<b>there was Malware in the drives?</b>	15:39
18	think he is trying to protect his family, his	15:36	18	A. That's what French told me.	15:39
19	employees, and his assets, his own life, and revenge.	15:36	19	MR. GAVENMAN: Objection to form.	15:39
20	That's the goals, three goals, he proposed, and that	15:36	20	THE WITNESS: I have not -- yeah.	15:39
21	later evolved into anti-CCP, but still support CGP.	15:36	21	BY MR. GREIM:	15:39
22	Now he's moved along that line to overthrow the CCP	15:37	22	<b>Q. Did you realize that that required</b>	15:39
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1	MR. GRENDI: Objection to the form.	15:42	1	second week, but he wants to see you're able to get	15:44
2	THE WITNESS: Yes.	15:42	2	this information as you said.	15:44
3	BY MR. GREIM:	15:42	3	<b>Q. Do you recall whether Mr. Guo had some</b>	15:44
4	<b>Q. Do you recall that Strategic Vision</b>	15:42	4	<b>event or some specific reason for wanting to have</b>	15:45
5	<b>reported to you that they had found Customs fraud?</b>	15:42	5	<b>information within the first couple of weeks?</b>	15:45
6	MR. GRENDI: Objection to form.	15:42	6	MR. GRENDI: Objection to form.	15:45
7	MR. GAVENMAN: Objection to form.	15:42	7	MR. GAVENMAN: Objection to form.	15:45
8	THE WITNESS: Yes.	15:42	8	THE WITNESS: No. I think he wants to get,	15:45
9	BY MR. GREIM:	15:42	9	you know, his money's worth. I think also -- this is	15:45
10	<b>Q. Do you recall that Strategic Vision</b>	15:42	10	just my speculation, that he planned to have a global	15:45
11	<b>reported to you that they had found possible human</b>	15:42	11	press conference. I don't know if he's planning to	15:45
12	<b>trafficking?</b>	15:42	12	expose it, but he wants to get information so he will	15:45
13	MR. GAVENMAN: Objection to form.	15:42	13	be comfortable when he do this, you know, global	15:45
14	MR. GRENDI: Objection to form.	15:42	14	press release conference.	15:45
15	THE WITNESS: Yes.	15:42	15	BY MR. GREIM:	15:45
16	BY MR. GREIM:	15:42	16	<b>Q. Did he disclose that conference to</b>	15:45
17	<b>Q. And did you report those facts to Mr.</b>	15:42	17	<b>Strategic Vision?</b>	15:45
18	<b>Guo?</b>	15:42	18	MR. GAVENMAN: Objection to form.	15:45
19	A. Yes.	15:42	19	THE WITNESS: I don't know.	15:45
20	<b>Q. What was his response?</b>	15:42	20	MR. GRENDI: Objection to form.	15:45
21	A. He -- I forgot. I cannot recall exactly	15:42	21	THE WITNESS: Not in my presence. I don't	15:45
22	his reaction, but my impression now, I think he	15:43	22	recall that, I should say.	15:46
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1	didn't understand the significance of this	15:43	1	BY MR. GREIM:	15:46
2	information and he's so into whatever is in the	15:43	2	<b>Q. Do you believe that -- or, well, let me</b>	15:46
3	contract, you know, bank statements, how they --	15:43	3	<b>-- I'll strike that. Did Mr. Guo ever end up getting</b>	15:46
4	money transferred, that type of information. That's	15:43	4	<b>research on these 15 individuals and using it for the</b>	15:46
5	just my guess.	15:43	5	<b>purposes that he claimed he would use it?</b>	15:46
6	<b>Q. So did Mr. Guo tell you that he believed</b>	15:43	6	MR. GRENDI: Objection to the form.	15:46
7	<b>that within the first week or two, he would be</b>	15:43	7	MR. GAVENMAN: Objection.	15:46
8	<b>getting actual bank statements for the subjects?</b>	15:43	8	THE WITNESS: Please rephrase that.	15:46
9	A. Say that again.	15:43	9	BY MR. GREIM:	15:46
10	<b>Q. Did Mr. Guo tell you that within the</b>	15:43	10	<b>Q. Sure. Did Mr. Guo ever end up getting</b>	15:46
11	<b>first week or two, he thought he would be getting</b>	15:43	11	<b>information on the 15 individuals and then using it</b>	15:46
12	<b>actual bank statements for the subjects?</b>	15:44	12	<b>for the purposes he claimed he was going to use</b>	15:46
13	A. No. I think he wants to see whatever is	15:44	13	<b>Strategic Vision's research?</b>	15:46
14	in the contract, not just bank accounts. I'm just	15:44	14	MR. GRENDI: Objection to the form.	15:46
15	using that as an example.	15:44	15	MR. GAVENMAN: Objection.	15:46
16	<b>Q. Sure.</b>	15:44	16	THE WITNESS: That's a hypothetical question.	15:46
17	A. Because there are three or four	15:44	17	BY MR. GREIM:	15:46
18	different categories of information. He wants to	15:44	18	<b>Q. Well, no. I wonder it if it actually</b>	15:46
19	see, you know, the progress each time, each month,	15:44	19	<b>happened?</b>	15:46
20	each week that there is a progress on those type of	15:44	20	A. No. It never happened, because the	15:46
21	information. I don't think he expected to get, you	15:44	21	information is not what he's asking for.	15:47
22	know, like good intelligence in the first week or	15:44	22	<b>Q. But did he ever go to somebody else --</b>	15:47
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1	A. I don't know.	15:47	1	we still have many left. I mean here, the many left,	15:49
2	<b>Q. -- and get the research and then go</b>	15:47	2	but we didn't get anything.	15:49
3	<b>expose Chinese Communist leaders?</b>	15:47	3	<b>Q. So when you said we have many left, it's</b>	15:49
4	MR. GRENDI: Objection to form.	15:47	4	<b>your testimony you're referring to people who are not</b>	15:49
5	MR. GAVENMAN: Objection to form.	15:47	5	<b>part of 15 whose names might have appeared?</b>	15:49
6	THE WITNESS: I'm not aware of that.	15:47	6	A. No, no, no. If you read this, 82, page	15:49
7	BY MR. GREIM:	15:47	7	82, I said even there are five RP people, that means	15:49
8	<b>Q. Do you recall Strategic Vision asking</b>	15:47	8	people in this list that's under protection. There	15:49
9	<b>you to ask Guo to provide some non-records-protected</b>	15:47	9	are -- we still have many left. That means many in	15:49
10	<b>names?</b>	15:47	10	this list that left, we can go after them, but I said	15:49
11	MR. GRENDI: Objection to form.	15:47	11	we didn't get anything. I mean they didn't do	15:49
12	THE WITNESS: I don't know that. Say that	15:47	12	anything to collect that information. It put me in a	15:49
13	again. Non-record?	15:47	13	very difficult spot.	15:49
14	BY MR. GREIM:	15:47	14	More importantly, it failed to advance our	15:49
15	<b>Q. Do you recall that Strategic Vision</b>	15:47	15	agenda. So that's what said this project to do, to	15:50
16	<b>asked you to ask Guo to provide some</b>	15:47	16	get information to expose the corruption of Chinese	15:50
17	<b>non-records-protected names?</b>	15:47	17	Communist, you know, high-ranking officials.	15:50
18	MR. GRENDI: Objection to the form.	15:47	18	<b>Q. I guess --</b>	15:50
19	THE WITNESS: I don't remember, but there's	15:47	19	A. That's what I was upset about.	15:50
20	plenty in this list that is not protected.	15:47	20	<b>Q. Right, but I guess my question to you is</b>	15:50
21	BY MR. GREIM:	15:47	21	<b>how do you know they were not gathering that</b>	15:50
22	<b>Q. Do you know that?</b>	15:48	22	<b>information?</b>	15:50
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1	A. Yeah, because they told me they have	15:48	1	A. Because they told me they only found	15:50
2	four or five people that is under, you know, the	15:48	2	five or four. They are not sure how many actually	15:50
3	protection, but there's so many here. Even they said	15:48	3	are in this PR under protection, but if they only	15:50
4	15, but there's plenty, because Miles tried to stack	15:48	4	found two, I mean, or four or five, there's so many	15:50
5	more names into this research project.	15:48	5	here.	15:50
6	<b>Q. So did you tell Strategic Vision that it</b>	15:48	6	<b>Q. Didn't they go and get information on</b>	15:50
7	<b>should just move on and start investigating other</b>	15:48	7	<b>someone named Frank Swen?</b>	15:50
8	<b>members of the family tree?</b>	15:48	8	MR. GRENDI: Objection.	15:50
9	A. Yes. It's in here.	15:48	9	MR. GAVENMAN: Objection to form.	15:50
10	MR. GAVENMAN: Objection to form.	15:48	10	THE WITNESS: But that's not information in	15:50
11	THE WITNESS: I think in the texts made it	15:48	11	the contract. The information is only on surface,	15:50
12	very specific.	15:48	12	some kind of, you know, like use the, you know,	15:50
13	BY MR. GREIM:	15:48	13	Social Security account, maybe some passport issue.	15:50
14	<b>Q. Let's see. Show me where you're</b>	15:48	14	It's not the information. You know, they touched	15:51
15	<b>pointing to.</b>	15:48	15	some things, but not the information, you know, as	15:51
16	A. I don't remember, but it's in here.	15:48	16	specified.	15:51
17	<b>Q. Okay. I would like to go -- because you</b>	15:48	17	BY MR. GREIM:	15:51
18	<b>pointed to your text. I would like to see where you</b>	15:48	18	<b>Q. Let me ask you this: Your text says and</b>	15:51
19	<b>provided that advice. It would have to be --</b>	15:48	19	<b>you've been saying today that only five are records</b>	15:51
20	A. Okay. Let me see. Like, for example,	15:48	20	<b>protected.</b>	15:51
21	in 82, I discuss with French, said I'm disappointed	15:48	21	A. That's what they told me.	15:51
22	with the result. Ever there are five RP people, but	15:49	22	<b>Q. That's -- well, I think you're reading</b>	15:51
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1	MR. GRENDI: Objection to the form.	15:55	1	<b>Q. We're getting too conversational, Mr.</b>	15:57
2	MR. GAVENMAN: Objection.	15:55	2	<b>Han.</b>	15:57
3	THE WITNESS: I don't recall. I think I	15:55	3	A. Yeah.	15:57
4	probably heard from Mike and French, not from Miles.	15:55	4	<b>Q. Let me ask you another question. Have</b>	15:57
5	BY MR. GREIM:	15:56	5	<b>you heard of Robert S. Tucker or Duncan Levin?</b>	15:57
6	<b>Q. When you heard that was happening, what</b>	15:56	6	A. Yes.	15:57
7	<b>did you do?</b>	15:56	7	<b>Q. Have you met them?</b>	15:58
8	A. I don't remember. I was disappointed.	15:56	8	A. I met with Tucker.	15:58
9	I know that I put lots of hope in this project and I	15:56	9	<b>Q. Okay. And was he a member of the</b>	15:58
10	hoped its success. I feel I failed on both sides. I	15:56	10	<b>security team for Guo?</b>	15:58
11	tried to put two sides together, have Miles to pay	15:56	11	A. At the time.	15:58
12	for this, dig up something that we can use to expose	15:56	12	MR. GAVENMAN: Objection to form.	15:58
13	the Communist regime's corruption so that it advances	15:56	13	MR. GRENDI: Objection to form.	15:58
14	our agenda on anti-CCP, but I failed because I	15:56	14	BY MR. GREIM:	15:58
15	unforeseen the difficulties of finding this	15:56	15	<b>Q. Was this in, what, 2017?</b>	15:58
16	information and working together.	15:56	16	A. Yes.	15:58
17	So that's just my assessment.	15:56	17	<b>Q. Do you know if Guo used Mr. Tucker to do</b>	15:58
18	<b>Q. But to be fair, you don't know of Mr.</b>	15:56	18	<b>this research?</b>	15:58
19	<b>Guo being able to do project like this with anyone</b>	15:56	19	A. I didn't.	15:58
20	<b>else, do you?</b>	15:57	20	MR. GAVENMAN: Objection to the form.	15:58
21	MR. GRENDI: Objection.	15:57	21	BY MR. GREIM:	15:58
22	MR. GAVENMAN: Objection to form.	15:57	22	<b>Q. Or research similar to this?</b>	15:58
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1	THE WITNESS: Can you rephrase that?	15:57	1	A. I didn't.	15:58
2	BY MR. GREIM:	15:57	2	<b>Q. Did there come a time when Tucker was no</b>	15:58
3	<b>Q. But to be fair, you don't of Mr. Guo</b>	15:57	3	<b>longer being used as the security person for Guo?</b>	15:58
4	<b>doing a project like this with anyone else, do you?</b>	15:57	4	A. I didn't know when they terminate his	15:58
5	MR. GRENDI: Objection.	15:57	5	thing and I just later learned because they changed	15:58
6	MR. GAVENMAN: Objection to form.	15:57	6	security. I didn't ask why.	15:58
7	THE WITNESS: I don't know if he's doing	15:57	7	<b>Q. Do you know anything about what Mr.</b>	15:58
8	anything or have done anything with other group	15:57	8	<b>Tucker did for Mr. Guo?</b>	15:58
9	whatsoever except this one.	15:57	9	A. I didn't.	15:58
10	BY MR. GREIM:	15:57	10	MR. GRENDI: Objection.	15:58
11	<b>Q. On that point, have you ever heard of</b>	15:57	11	MR. GAVENMAN: Objection.	15:58
12	<b>T&amp;M -- that's the letter T and M --Protection</b>	15:57	12	THE WITNESS: Except one thing.	15:58
13	<b>Resources?</b>	15:57	13	MR. GAVENMAN: You can answer.	15:58
14	A. No. Can you -- who -- is that his	15:57	14	THE WITNESS: I can answer? Okay. Except	15:58
15	security team?	15:57	15	one thing. I had a breakfast with Tucker and he told	15:59
16	<b>Q. At one time, I believe.</b>	15:57	16	me that during the breakfast that one of his	15:59
17	MR. GRENDI: Objection. I mean, who's	15:57	17	Communist -- we suspect a Communist agent approached	15:59
18	testifying? Sorry.	15:57	18	him. We suspect this guy is the smear campaign	15:59
19	MR. GREIM: Yeah. That's right. Let's keep	15:57	19	commander in this country. We know he's very close	15:59
20	it Q&A. I'm sorry.	15:57	20	to CCP, high ranking, and this guy, his name is Bruno	15:59
21	MR. GRENDI: Thanks.	15:57	21	Wu.	15:59
22	BY MR. GREIM:	15:57	22	Bruno Wu approached Tucker, offered him 20	15:59
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1	million cash to switch to espionage on Miles, and	15:59	1	answered.	16:20
2	Tucker asked where you get the cash and he said from	15:59	2	THE WITNESS: I don't remember I saw that.	16:20
3	Jack Ma, Alibaba, and then he said they had this	16:00	3	BY MR. GREIM:	16:20
4	conversation in the open. He videotaped the	16:00	4	<b>Q. Okay. Would you have introduced</b>	16:20
5	conversation.	16:00	5	<b>Strategic Vision to the Japan and Taiwan projects if</b>	16:20
6	BY MR. GREIM:	16:00	6	<b>you thought that Strategic Vision was dishonest?</b>	16:20
7	<b>Q. Tucker did?</b>	16:00	7	MR. GAVENMAN: Objection to form.	16:20
8	A. Tucker did. That's the only thing I	16:00	8	MR. GRENDI: Objection.	16:20
9	remember during the conversation I had with him.	16:00	9	THE WITNESS: I wouldn't.	16:20
10	MR. GREIM: All right. Okay. Let's take a	16:00	10	BY MR. GREIM:	16:20
11	short break.	16:00	11	<b>Q. Okay. Let's see. I didn't ask you this</b>	16:20
12	MR. GRENDI: Yeah.	16:00	12	<b>before: Have you ever met Karin Maestrello?</b>	16:20
13	VIDEOGRAPHER: Going off the record. The	16:00	13	A. Who is that?	16:20
14	time is 4:02 p.m.	16:00	14	<b>Q. Okay. Then I guess -- have you heard</b>	16:20
15	[Recess.]	16:00	15	<b>that name before?</b>	16:21
16	VIDEOGRAPHER: We are back on the record.	16:18	16	A. Carol?	16:21
17	The time is now 4:20 p.m.	16:18	17	<b>Q. Karin Maestrello.</b>	16:21
18	BY MR. GREIM:	16:19	18	A. Karin? Karin? You mean Miles'	16:21
19	<b>Q. Mr. Han, you testified earlier that the</b>	16:19	19	assistant, Karin?	16:21
20	<b>projects being discussed at the end of the packet</b>	16:19	20	<b>Q. Yes.</b>	16:21
21	<b>we've marked as Exhibit 10, that those projects did</b>	16:19	21	A. Yes. I met. The Italian girl?	16:21
22	<b>not come to fruition?</b>	16:19	22	<b>Q. The what?</b>	16:21
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1	MR. GAVENMAN: Objection.	16:19	1	A. Italian girl.	16:21
2	THE WITNESS: With --	16:19	2	<b>Q. Italian girl, that's right.</b>	16:21
3	BY MR. GREIM:	16:19	3	A. Yes. I met her.	16:21
4	<b>Q. With Strategic Vision?</b>	16:19	4	<b>Q. Do you know what she does for Mr. Guo?</b>	16:21
5	A. No.	16:19	5	A. She's just --	16:21
6	<b>Q. And did that include the Taiwan project?</b>	16:19	6	MR. GAVENMAN: Objection to form.	16:21
7	A. Correct. We are still waiting for that	16:19	7	MR. GRENDI: Objection to form.	16:21
8	response.	16:19	8	THE WITNESS: My understanding is like an	16:21
9	<b>Q. Do you recall the contact in Taiwan</b>	16:19	9	assistant, office assistant.	16:21
10	<b>citing the political article as a concern in working</b>	16:19	10	BY MR. GREIM:	16:21
11	<b>with Strategic Vision?</b>	16:19	11	<b>Q. Do you recall that -- do you recall</b>	16:21
12	A. No. What's that? Can you remind me?	16:19	12	<b>hearing that Mr. Guo, himself, told Ms. Wallop and</b>	16:21
13	<b>Q. Well, are you aware of an article in</b>	16:19	13	<b>Mr. Waller that Yvette Wang was still a member of the</b>	16:21
14	<b>"Politico" about -- written about Eastern Profit and</b>	16:19	14	<b>Chinese Communist Party?</b>	16:22
15	<b>Strategic Vision in this case?</b>	16:19	15	A. No. I don't recall that.	16:22
16	A. I saw that article, but that has nothing	16:19	16	<b>Q. Do you recall telling Ms. Wallop and Mr.</b>	16:22
17	to do with the Taiwan project.	16:20	17	<b>Waller that Yvette Wang was still a member of the</b>	16:22
18	<b>Q. Oh. I understand. It doesn't discuss</b>	16:20	18	<b>Chinese Communist Party?</b>	16:22
19	<b>the Taiwan project at all, but do you recall that the</b>	16:20	19	A. I don't. I don't recall that.	16:22
20	<b>contact in the Taiwan project mentioned the</b>	16:20	20	<b>Q. Do you think it's possible and just</b>	16:22
21	<b>"Politico" article?</b>	16:20	21	<b>don't remember?</b>	16:22
22	MR. GAVENMAN: Objection, form, asked and	16:20	22	A. I think it's possible.	16:22
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1	<b>matter?</b>	16:35	1	<b>-- I'll call them fake dissidents, people are</b>	16:37
2	MR. GREIM: Objection, calls for speculation	16:35	2	<b>pretending to be dissidents?</b>	16:37
3	and opinion and also vague.	16:35	3	A. Yes.	16:37
4	THE WITNESS: I think they have a good	16:35	4	<b>Q. And what do those fake dissidents do?</b>	16:37
5	intention at the beginning and want to do the right	16:35	5	<b>What is their purpose?</b>	16:37
6	thing, and yeah. I have no doubt, otherwise, I	16:35	6	A. If we're talking about specifically	16:37
7	wouldn't introduce them to Miles.	16:35	7	related to this project --	16:37
8	BY MR. GRENDI:	16:35	8	<b>Q. Sure.</b>	16:37
9	<b>Q. Do you think they cared about the money?</b>	16:35	9	A. They're a smear campaign against Miles	16:37
10	A. They do care about the money, but they	16:35	10	Kwok. That was number one that those fake dissidents	16:37
11	do also care about the political agenda.	16:35	11	are doing, and in addition to that, there are a lot	16:38
12	<b>Q. What is Hansheng Wang look like?</b>	16:35	12	of people that Miles sued or countersued who are	16:38
13	A. He's a very quiet guy, very reserved,	16:35	13	involved in fake political asylum business and they	16:38
14	never participated in any of our meetings.	16:35	14	are to survive to make money, like fake persons.	16:38
15	<b>Q. Have you ever talked to him?</b>	16:35	15	We have evidence to show they made -- he	16:38
16	A. Occasionally.	16:35	16	helped people to fabricate fake political asylum	16:38
17	<b>Q. If you recall, what did you talk to him</b>	16:35	17	cases, and there are many more. Like another guy, a	16:38
18	<b>about?</b>	16:36	18	lawyer, also does the same thing and then he's also	16:38
19	A. I think it's like what he -- where he	16:36	19	somehow connected with the MSS and the Chinese	16:38
20	come from, where's his native province and what the	16:36	20	Embassy.	16:38
21	family were doing. I think he just come from a poor	16:36	21	There are so many of them. You know, I think	16:38
22	family, like a rural farmer, stuff like that.	16:36	22	you probably need to talk to the FBI to get this	16:38
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1	<b>Q. How many times have you met him?</b>	16:36	1	information.	16:39
2	A. I don't know. I don't remember exactly	16:36	2	<b>Q. So you believe the CCP is employing</b>	16:39
3	how many times, but every time I've been to the	16:36	3	<b>hundreds of fake dissidents, if you know, however</b>	16:39
4	apartment, most of the time he's there.	16:36	4	<b>many you think?</b>	16:39
5	<b>Q. Is he a dissident?</b>	16:36	5	A. I don't know how many. I have no idea	16:39
6	MR. GREIM: Objection, calls for opinion.	16:36	6	how many, but in this particular case against Miles,	16:39
7	THE WITNESS: Well, no. I think he is part	16:36	7	they hired very many to do their dirty work,	16:39
8	of, you know, Miles' team. You know, you can't	16:36	8	basically drag them into this lawsuit. At the	16:39
9	escape that. Everybody becomes a dissident now.	16:36	9	beginning, I think lots of dissidents, whether fake	16:39
10	BY MR GRENDI:	16:37	10	or real, they come to Miles and try to get support,	16:39
11	<b>Q. Anyone who does business with Miles</b>	16:37	11	financial support, from him, and when that failed and	16:39
12	<b>and --</b>	16:37	12	they started fighting over social media, criticized	16:39
13	A. Anyone associated with him, does	16:37	13	Miles, and that caused them anger from Miles' side.	16:39
14	business with him, they will all become a dissident.	16:37	14	So he started suing them, and those dissidents or	16:40
15	<b>Q. And they're putting their lives at risk</b>	16:37	15	activists, so called, they have now resources to do	16:40
16	<b>if they go back to China by doing so?</b>	16:37	16	this and then we saw the money transfer from the	16:40
17	MR. GREIM: Objection, calls for speculation.	16:37	17	Chinese Government. They use one singular law firm	16:40
18	THE WITNESS: Absolutely.	16:37	18	to do -- you know, didn't bother to change their	16:40
19	BY MR. GREIM:	16:37	19	complaints, and then we have some evidence	16:40
20	<b>Q. I'm sorry. What was your --</b>	16:37	20	independently -- it has nothing to do with Miles --	16:40
21	A. Absolutely.	16:37	21	we obtained from people that we know, showing that	16:40
22	<b>Q. Okay. Do you know if the CCP employees</b>	16:37	22	they work closely with the Chinese consulate in New	16:40
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1	York, the embassy here, and money their transferred	16:40	1	<b>Q. Do they ever post fake images?</b>	16:43
2	from different channels to pay for the legal bill.	16:40	2	A. Could be.	16:43
3	<b>Q. Are you familiar with a website called</b>	16:40	3	<b>Q. Fake videos?</b>	16:43
4	<b>Boxun, B-O-X-U-N, I think?</b>	16:41	4	A. That, I'm not expert on that. So I	16:43
5	A. Yes.	16:41	5	can't tell.	16:43
6	<b>Q. And what does that website do?</b>	16:41	6	<b>Q. Would it surprise you if they did?</b>	16:43
7	A. That website used to be a dissident	16:41	7	A. No. I'm not surprised by that.	16:43
8	Chinese language dissident -- you know, it's like a	16:41	8	<b>Q. Are you aware that Google recently took</b>	16:43
9	free press. It's a free platform. Everybody can put	16:41	9	<b>down a number of videos from its platform that were</b>	16:43
10	their stuff in there, but mostly, it's the dissidents	16:41	10	<b>posted by fake dissidents?</b>	16:43
11	who use that website to access information, post	16:41	11	A. Yes.	16:43
12	their grievances or the articles they wrote.	16:41	12	<b>Q. Do you know if any of those videos were</b>	16:43
13	<b>Q. So it's sort of open source; anyone can</b>	16:41	13	<b>critical of Miles Kwok or Guo Wengui?</b>	16:43
14	<b>post on it?</b>	16:41	14	A. I don't know specific. I suspect, yeah.	16:43
15	A. Correct.	16:41	15	There might be some.	16:43
16	<b>Q. Have fake dissidents posted information</b>	16:41	16	<b>Q. Because Guo Wengui is a real dissident.</b>	16:43
17	<b>on that website?</b>	16:41	17	<b>Right?</b>	16:43
18	A. I'm sure there are many Chinese	16:41	18	A. Guo Wengui, yes. I would characterize	16:43
19	Communists, you know, like sui jin. The water army,	16:41	19	him as a real dissident.	16:44
20	that's the term that posts stuff on that website as	16:41	20	<b>Q. And the CCP pretty desperate to get him</b>	16:44
21	well.	16:41	21	<b>back to China and put him in jail?</b>	16:44
22	<b>Q. So you wouldn't necessarily trust</b>	16:41	22	A. Correct.	16:44
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1	<b>anything coming out of Boxun because fake dissidents</b>	16:41	1	<b>Q. In drafting the contract, was there a</b>	16:44
2	<b>post information there?</b>	16:42	2	<b>concern about Mr. Wengui being identified in</b>	16:44
3	A. No. It depends on the information.	16:42	3	<b>connection with the research agreement?</b>	16:44
4	<b>Q. Do you happen know where Exhibit 3 and</b>	16:42	4	A. I think there was, if I recall	16:44
5	<b>Exhibit 3 were posted, where they came from?</b>	16:42	5	correctly.	16:44
6	A. No, I don't. Which one?	16:42	6	<b>Q. I'll take you back to the contract. Do</b>	16:44
7	<b>Q. Three.</b>	16:42	7	<b>you remember if there was a specific schedule in that</b>	16:44
8	A. Okay. Yeah.	16:42	8	<b>agreement concerning when reports were to be</b>	16:44
9	<b>Q. Do you know if Boxun was the uploading</b>	16:42	9	<b>delivered?</b>	16:44
10	<b>entity that put this video out there?</b>	16:42	10	A. Yes. There is.	16:44
11	A. I didn't know that.	16:42	11	<b>Q. Was it -- did it call for reports within</b>	16:44
12	<b>Q. Would you trust it if it came from</b>	16:42	12	<b>the first week, in the first month of the contract?</b>	16:45
13	<b>Boxun?</b>	16:42	13	A. Yeah. I think there is a specific	16:45
14	A. It depends on the content. I think it	16:42	14	requirement on the first week. I think it's just	16:45
15	depends on the information.	16:42	15	trying to show the progress, we're on the right	16:45
16	<b>Q. Well, let me ask you this.</b>	16:42	16	track.	16:45
17	A. Not necessarily whether it showed on the	16:42	17	<b>Q. Well, let's look at the agreement. What</b>	16:45
18	platform.	16:42	18	<b>number is that? It's number --</b>	16:45
19	<b>Q. Have fake dissidents posted false</b>	16:42	19	MR. GAVENMAN: Eleven.	16:45
20	<b>information about other dissidents to disrupt the --</b>	16:42	20	MR. GRENDI: Eleven.	16:45
21	<b>I'll call it the effort to damage the CCP?</b>	16:42	21	MR. GREIM: Let me just say while we're	16:45
22	A. Yeah. There are some.	16:42	22	pulling it up, the witness was instructed not to	16:45
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1	answer previously about the agreement on the ground	16:45	1	<b>reports per individual subject to the client within a</b>	16:47
2	it was calling for a legal conclusion. So I would	16:45	2	<b>specified timeframe as well as all relevant</b>	16:47
3	hope we'd have consistence.	16:45	3	<b>supporting data."</b>	16:47
4	MR. GAVENMAN: It depends on what the	16:45	4	<b>Do you see that?</b>	16:47
5	question is.	16:45	5	A. Yes.	16:47
6	MR. GRENDI: I wasn't asking about a legal	16:45	6	<b>Q. I'll ask you again did Strategic Vision</b>	16:47
7	opinion on it.	16:45	7	<b>deliver weekly reports within the first month of the</b>	16:47
8	Oh, there's my copy. I'm sorry.	16:45	8	<b>agreement?</b>	16:47
9	BY MR. GRENDI:	16:45	9	A. No.	16:47
10	<b>Q. Just looking at the second page, it says</b>	16:45	10	<b>Q. If you look further down the page, it</b>	16:47
11	<b>the contractor will produce progress reports on this</b>	16:46	11	<b>says: "The contractor will produce social media</b>	16:47
12	<b>--</b>	16:46	12	<b>research per individual subject to the client on a</b>	16:47
13	A. Where is that?	16:46	13	<b>weekly basis for the first month and on a monthly</b>	16:47
14	<b>Q. Oh, I'm sorry. The first full paragraph</b>	16:46	14	<b>basis thereafter except under circumstances that</b>	16:47
15	<b>on the second page.</b>	16:46	15	<b>require more frequent reporting, paren, weekly or</b>	16:47
16	A. Okay. Okay. Yes.	16:46	16	<b>fortnightly, as the client directs or irregular</b>	16:48
17	<b>Q. It says: "The contractor will produce a</b>	16:46	17	<b>emergencies that the contractor may discover."</b>	16:48
18	<b>progress report on this financial forensic research</b>	16:46	18	<b>Do you see that?</b>	16:48
19	<b>each week in the first month, one preliminary report</b>	16:46	19	A. Um-hum.	16:48
20	<b>in the first month and one comprehensive historical</b>	16:46	20	<b>Q. Did Strategic Vision deliver weekly</b>	16:48
21	<b>research report within three months."</b>	16:46	21	<b>reports during the first month of the agreement</b>	16:48
22	<b>And then it goes on to talk about update</b>	16:46	22	<b>concerning social media research?</b>	16:48
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1	<b>reports. Do you see that section there?</b>	16:46	1	MR. GREIM: Objection, foundation.	16:48
2	A. Yes.	16:46	2	THE WITNESS: No.	16:48
3	<b>Q. Did Strategic Vision deliver financial</b>	16:46	3	BY MR. GRENDI:	16:48
4	<b>forensic research reports each week in the first</b>	16:46	4	<b>Q. And if you look in the middle of the</b>	16:48
5	<b>month?</b>	16:46	5	<b>page there, again, we're on Eastern-000006, the</b>	16:48
6	MR. GREIM: Objection. Counsel has not	16:46	6	<b>middle paragraph says: "The contractor will produce</b>	16:48
7	actually read the portion of the contract that he's	16:46	7	<b>concurrent tracking research per individual subject</b>	16:48
8	purporting to ask about.	16:46	8	<b>to the client on a month basis except in the first</b>	16:48
9	MR. GRENDI: What are you talking about?	16:46	9	<b>month that weekly reports shall be delivered and</b>	16:48
10	THE WITNESS: No.	16:46	10	<b>under circumstances that require more frequent</b>	16:48
11	MR. GRENDI: Would you like me to read the	16:46	11	<b>reporting, paren, weekly or fortnightly, end paren,</b>	16:48
12	full sentence, Mr. Greim? Is that what you're	16:46	12	<b>as the client directs up to a six-month period."</b>	16:48
13	getting at?	16:46	13	<b>Do you see that?</b>	16:48
14	BY MR. GRENDI:	16:46	14	A. Yes.	16:48
15	<b>Q. Let me try it again. Looking at this</b>	16:46	15	<b>Q. Did Strategic Vision deliver weekly</b>	16:49
16	<b>first full paragraph on the second page, it says:</b>	16:46	16	<b>reports on tracking research per individual subject</b>	16:49
17	<b>"The contractor will produce a progress report on</b>	16:46	17	<b>during the first month of the agreement?</b>	16:49
18	<b>this financial forensic research each week in the</b>	16:47	18	A. No.	16:49
19	<b>first month, one preliminary report in the first</b>	16:47	19	<b>Q. Okay. Did there come a time when</b>	16:49
20	<b>month, and one comprehensive historical research</b>	16:47	20	<b>Strategic Vision delivered a 60-gigabyte hard drive</b>	16:49
21	<b>report within three months and with update reports</b>	16:47	21	<b>of data to Eastern Profit?</b>	16:49
22	<b>sin each following month. The client may require</b>	16:47	22	A. Yes.	16:49
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1	<b>Q. And what was on that hard drive?</b>	16:49	1	A. Is this relevant?	16:51
2	A. It's lots of junk information.	16:49	2	<b>Q. Well, that's what I'm going to get at</b>	16:51
3	<b>Q. Was any of that information the kind of</b>	16:49	3	<b>here, because my understanding would probably be that</b>	16:51
4	<b>useful reporting that Eastern Profit would have</b>	16:49	4	<b>you don't want to reveal the name of that entity.</b>	16:51
5	<b>expected under this agreement?</b>	16:49	5	A. No.	16:52
6	MR. GREIM: Objection, foundation, calls for	16:49	6	<b>Q. Okay. Is that because it's normally</b>	16:52
7	opinion.	16:49	7	<b>confidential; you don't disclose the dealings of</b>	16:52
8	THE WITNESS: No.	16:49	8	<b>private investigatory research clients that you're</b>	16:52
9	BY MR. GRENDI:	16:49	9	<b>working with with Strategic Vision?</b>	16:52
10	<b>Q. Okay. I believe you testified before</b>	16:49	10	A. Correct.	16:52
11	<b>that you had heard that Team 2 found evidence of --</b>	16:50	11	MR. GRENDI: So, Attorney Greim, we can talk	16:52
12	<b>strike that.</b>	16:50	12	about whether you're going to try to use that in	16:52
13	<b>Did you ever hear that Team 2 of Strategic</b>	16:50	13	damages and we can talk about who this client is and	16:52
14	<b>Vision's team found evidence of Social Security</b>	16:50	14	find out information about it or you can -- we can	16:52
15	<b>number fraud or human trafficking or customs fraud?</b>	16:50	15	lay off on that and maybe talk to your client about	16:52
16	A. Say that again.	16:50	16	it.	16:52
17	<b>Q. Sorry. Did there ever come a time when</b>	16:50	17	MR. GREIM: Yeah. Let's just -- let's take	16:52
18	<b>you heard from Strategic Vision that its second team</b>	16:50	18	one minute.	16:52
19	<b>-- they call it Team 2 -- had found evidence of</b>	16:50	19	MR. GRENDI: Sure. Off the record.	16:52
20	<b>Social Security fraud, human trafficking, or customs</b>	16:50	20	VIDEOGRAPHER: Going off the record. The	16:52
21	<b>fraud concerning the subjects of the research</b>	16:50	21	time is now 4:54 p.m.	16:52
22	<b>agreement?</b>	16:50	22	[Mr. Greim confers with Ms. Wallop and Mr.	16:52
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1	A. Yes, but I don't hear the Team 2, that	16:50	1	Waller.]	16:54
2	term. I was not familiar with the Team 2.	16:50	2	VIDEOGRAPHER: We are back on the record.	16:54
3	<b>Q. Let's just say Strategic Vision. Did</b>	16:51	3	The time is now 4:57 p.m.	16:55
4	<b>Strategic Vision tell you it had found that kind of</b>	16:51	4	BY MR. GRENDI:	16:55
5	<b>information?</b>	16:51	5	<b>Q. So, Mr. Han, if you would please</b>	16:55
6	A. Yes.	16:51	6	<b>identify the client or potential client from Taiwan</b>	16:55
7	<b>Q. They did ever give you any documents to</b>	16:51	7	<b>that you spoke of politically concerning a newspaper</b>	16:55
8	<b>prove that or show that that was the case?</b>	16:51	8	<b>article in "Politico".</b>	16:55
9	A. No.	16:51	9	A. There is a -- I saw that article. I	16:55
10	<b>Q. No. Okay. And the whole point of this</b>	16:51	10	didn't know what it referred to. They specifically	16:55
11	<b>agreement was to get that, like you said, the</b>	16:51	11	talked about the Taiwan project?	16:55
12	<b>concrete evidence that there was corruption in the</b>	16:51	12	<b>Q. No, no. I'm sorry. You know what?</b>	16:55
13	<b>CCP. Right?</b>	16:51	13	<b>Let's strike that question. I'll start over.</b>	16:55
14	A. Correct.	16:51	14	<b>what is the name of the entity you and</b>	16:55
15	<b>Q. But that was never delivered under this</b>	16:51	15	<b>Strategic Vision have been working on that comes from</b>	16:55
16	<b>agreement, was it?</b>	16:51	16	<b>Taiwan? Who is that?</b>	16:55
17	A. No.	16:51	17	A. There are several. The Taiwan National	16:55
18	<b>Q. I'll ask about this one, but I think</b>	16:51	18	Security Council and Taiwan DPP, which is the ruling	16:55
19	<b>we're going to have to eventually go off the record</b>	16:51	19	party, and the embassy here.	16:55
20	<b>on it. What is the name of project in Taiwan that</b>	16:51	20	<b>Q. And is Strategic Vision trying to</b>	16:55
21	<b>you were talking about with Attorney Greim just</b>	16:51	21	<b>solicit business from those entities?</b>	16:55
22	<b>before the break?</b>	16:51	22	A. Correct.	16:56
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